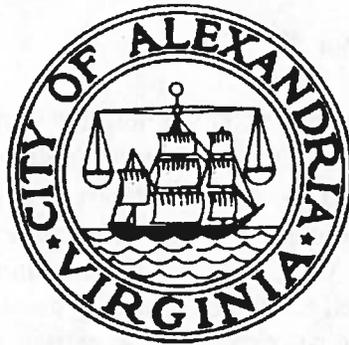


**Virginia Paving Operations in Alexandria
Special Use Permit #2010-0014
Year 2012 Paving Season in Review**



**Department of Transportation & Environmental Services
Office of Environmental Quality (OEQ)
March 22, 2013**

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1. Executive Summary

The City of Alexandria (“City”) issued a Special Use Permit (SUP) to the Virginia Paving Company (VAP) in November 2006 and granted an administrative amendment on May 5, 2010. The SUP amended the hours that vehicles could enter and exit the facility and was issued with a total of 78 conditions to address concerns from the City and the community, improve operational conditions at the facility, and enhance environmental protection. The SUP also provided the City with the authority to enforce compliance with those conditions.

The major activities and highlights for 2012:

- VAP was well within their annual production limits (app. 50% of the permitted).
- VAP operated on 106 nights of 110 permitted by SUP.
- The City continued to respond to odor complaints in a timely manner and also continued to monitor community conditions. A total of 14 complaints/episodes were reported and investigated by the City and VAP, of which 5 complaints were verified as originating from VAP. The City staff did continue its facility monitoring and also had extensive discussions with VAP during peak paving season to insure that appropriate steps were in place to minimize impacts on the community.
- Procedures remain in place to insure that the VAP Hotline is always answered by an attendant and the follow up procedures and generates a prompt response. VAP continued its messaging service and text notification in the event that the hotline was utilized.
- The City conducted a multi-departmental onsite inspection on August 16, 2012. The full report summary is attached.
- Virginia Department of Environmental Quality (VDEQ) conducted an air inspection on June 6, 2012 for compliance determination for the RAP (Recycled Asphalt Pavement) crusher and screener, and report dated June 20, 2012 determines the facility to be in compliance.
- VDEQ issued a stationary source permit for VAP. This amended permit supersedes all other previous permits and conditions, and incorporated RAP screener into the permit. The permit maintains many of the production limits (similar to ones in City SUP) on the plant as state enforceable.
- VAP operated the Alexandria plant utilizing natural gas as its primary fuel source for the 2012 paving season.
- VAP continued to operate its fuel efficient locomotive. This has eliminated air and noise complaints for many residents in the Cameron Station and Summer’s Grove areas.
- VAP continued to upgrade the security at the site to further eliminate noise complaints generated onsite.
- The City continued to operate an ambient air monitoring station for particulate matter (PM10) at the Armistead Boothe Park in Cameron Station.

2. Asphalt Production for 2012

Table I- Summary of Asphalt Production for 2012

Production Parameters	SUP LIMITS	2012 Actual
Total Annual Production in Tons	980,000 tons	481,857 tons
Night Annual Production in Tons**	275,000 tons	142,048 tons
Permitted Number of Nights	110	106

Table II- Summary of Monthly Production Data

Month	Total Production (tons)	Night Production (tons) **	Number of nights of actual production	Quarterly Production (tons)	Quarterly Number of Nights
January	16,185	0	0	57,034	0
February	33,992	0	0		
March	6,857	0	0		
April	40,699	10,835	11	162,506	46
May	39,173	17,861	16		
June	82,634	30,399	19		
July	64,667	24,906	18	172,095	44
August	76,278	30,197	18		
September	31,150	10,529	8		
October	53,287	17,321	16	90,219	16
November	24,737	N/A	N/A		
December	12,198	N/A	N/A		
Total Actual*	481,857	142,048	106		

* The underlying data monitored by the City for SUP compliance was reviewed and found to be correct.

** Night Production is based on any production conducted from 8 PM to 5 AM.

3. SUP REQUIRED PROJECTS

3.1 Projects Completed to Date

Several SUP conditions include specific completion dates for pertinent projects and improvements. VAP has completed all of the required capital improvement projects. The final phase of the landscape plan and the final one-third of diesel trucks were replaced and/or completed at the end of 2009. VAP has continued to provide environmental training for its staff and optimize the operation.

3.2 Information on Key Completed Projects

3.2.1 Blue Smoke Control for Silos, Load-Out Area, and Conveyors

Plant 1

Blue smoke refers to the color of smoke when asphalt is produced. The blue color results from burning silica present in feed materials, such as, sand and rocks. As hot asphalt, at approximately at 300-350 degrees Fahrenheit, is moved on conveyors from the production area to the storage silos and the delivery trucks, it releases blue fugitive emissions, i.e., blue smoke. VAP completed the installation of the blue smoke control technology for the Plant 1 silo tops in February 2007. In August of 2007, VAP completed the enclosing and venting of the Plant 1 load-out area. This improvement facilitates further reduction of fugitive emissions. As asphalt drops onto the delivery trucks, blue smoke is vented to the blue smoke control. In 2012, this process has been evaluated and many adjustments have been made to fine tune the collection of the blue smoke. One major adaptation is the daily monitoring of the magnehelic gauges that provide the inspection team a snapshot of the system's overall performance. Plant 1 began operating using natural gas as the primary fuel source in November 2011. As a result of this change, plant 1 operated the entire 2012 season using only natural gas. Plant personnel have no plans to operate other fuel sources unless there is an issue with the supplier.

Plant 2

VAP completed the second phase of blue smoke control technology at the facility, the enclosure and venting of Plant 2 silo tops, in July 2007. The final phase of the blue smoke control technology consists of enclosing and venting the Plant 2 load-out area to the collecting unit. This improvement has enabled further capture of odors generated when hot mix asphalt falls from Plant 2 silos onto the bed of the delivery trucks. This project was completed on schedule on June 28, 2008 and the City received a confirmation letter shortly afterwards. This blue smoke control is manufactured and serviced by the same company that developed the system for Plant 1. Plant 2 is a much smaller plant and the blue smoke control system is simply a smaller version. The operation checks and filter maintenance for this system are identical to Plant 1. Plant 2 has not been utilized in over 2 years. The plant is still listed on the VDEQ state operating permit but is partially dismantled and the components utilized in other areas. The final components are scheduled to be removed later this year.

3.2.2 Storm Water Management Facility

VAP installed two storm water management facilities (SWMFs) in December 2006 to provide treatment for storm water runoff leaving the VAP facility. The SWMF is located entirely underground and configured for convenient inspection and maintenance. Routine inspection of the system and auxiliary equipment are a part of the Virginia Paving's Storm Water Pollution Prevention Program. Storm water BMP inspections for both units occurred on April 25, 2011 and again on November 28, 2011. They include the inspection of existing cartridges and perlite media, and checking sediment build up within the vaults.

A canopy was erected over the equipment fueling station near the facility's office with a bin constructed within the canopy to keep out residual spillage at the fuel dispensers confined within the area, and precipitation runoff. An additional measure such as a maintenance agreement has been executed with the City.

The storm filter water maintenance vendor provides maintenance and certifies the adequate operation of the storm water filters. VAP maintains a record of operating personnel training on the SWMF and an O&M Manual is onsite as part of the Storm Water Pollution Prevention Plan (SWPPP). Records of inspections can additionally be found at the facility. Documentation on the most recent storm water BMP maintenance is attached.

3.2.3 Landscape Plan

The Virginia Paving’s landscape plan was finalized and approved by the City. Installation of landscapes commenced on May 7, 2007. During Phase 1, VAP completed plantings located on the west side of the property and the riparian zone buffer restoration. This area, set between VAP and Backlick Run, was engineered for both soil stability and ecological restoration. It serves as a complement to the storm water runoff treatment system, and it provides a natural bio-filter, protecting Backlick Runs aquatic environment from sedimentation, runoff, and erosion. Phase 1 plantings included a large stand of evergreens which was installed on the adjacent property at Ben Brenman Park to provide enhanced esthetics. Phase 2 plantings are situated on the southwest side of the property along the railroad. This serves as a vegetative buffer for adjacent communities. Phase 3 plantings were completed and placed toward the west portion of the property.

3.2.4 FCC Environmental Oil Recycling Plant

In 2012, FCC Environmental (FCC) continued to take initiatives to improve its recycled oil operation on VAP’s property. Specifically, FCC implemented a new vibrating screen, additional controls on the bio-filter area, including venting enclosure through two carbon filtration systems. Additionally, FCC continues to clean all used oil tanks using an innovative high pressure, low-temperature method. FCC Environmental has consistently shared with the City its monthly readings of volatile organic compounds (VOCs) and exiting the carbon filtration system. FCC Environmental, although not onsite 24 hours a day has provided a contact number onsite to respond to complaints regarding its operation.

3.2.5 Capital Improvement Projects

Table 3.2.5 provides a summary of all the projects completed. They have been listed by SUP condition for easy reference to the permit issued on November 2006 and granted administrative amendment on May 5, 2010.

TABLE 3.2.5			
Virginia Paving Company, Alexandria, Virginia			
Special Use Permit Compliance Schedule - Projects Completed by December 2012			
SUP Condition	Project Description	SUP Compliance Date	Completion Date
6	Maintain records low-odor additive use	Ongoing	In Compliance
8	Maintain records for recycled oil specifications	Ongoing	In Compliance

TABLE 3.2.5
Virginia Paving Company, Alexandria, Virginia
Special Use Permit Compliance Schedule - Projects Completed by December 2012

SUP Condition	Project Description	SUP Compliance Date	Completion Date
9	Maintain records for fuel type used on Code Orange and Code Red days	Ongoing	In Compliance
10	Maintain records on No. 2 oil type and sulfur content	Ongoing	In Compliance
11	Plant 1 – Blue Smoke Control	12/31/06	02/28/07
11	Plant 2 – Fugitive Emission Control System	07/30/07	07/24/07
12	Plant 1 – Low NOx Burner	12/31/07	Installed 4/07
12	Plant 2 – Low NOx Burner	10/30/06	03/14/05
13	Asphalt Storage Tank – Vent Condensers	09/30/06	08/17/06
14	Plant 1 Asphalt Conveyors and Loadout – Fugitive Emissions Capture & Control	09/30/07	08/24/07
14	Plant 2 Asphalt Conveyors and Loadout – Fugitive Emissions Capture & Control	06/30/08	06/28/08
15	Plant 1 - Baghouse Visible Emissions Test	Once per month	In Compliance
15	Plant 2 - Baghouse Visible Emissions Test	Once per month	In Compliance
16	First half of On-Site Trucks & Diesel Engines – 90% Efficient Particle Traps	10/31/06	09/30/2006
16	Second Half of On-Site Trucks & Diesel Engines – 90% Efficient Particle Traps	12/31/06	12/22/2006
16	One-Third of VA Paving Dump Trucks – Replace Trucks	12/31/07	12/31/07
16	One-Third of VA Paving Dump Trucks – Replace Trucks	12/31/08	12/31/08
16	One-Third of VA Paving Dump Trucks – Replace Trucks	12/31/09	12/31/09
17	Plant 1 – Increase Stack Height to 20 m	01/31/07	12/20/06
17	Plant 2 – Increase Stack Height to 20 m	01/31/07	12/22/06

TABLE 3.2.5 Virginia Paving Company, Alexandria, Virginia Special Use Permit Compliance Schedule - Projects Completed by December 2012			
SUP Condition	Project Description	SUP Compliance Date	Completion Date
18	Hot Oil Heater – Increase Stack Ht to 6 m	10/31/06	01/20/06
19	RAP Crusher – Water Sprays and Drop Enclosures	12/31/06	06/25/05
21	Maintain water spraying and wet vacuuming on paved roads records	Daily	In Compliance
22	Plant 2 Product Shipment (Eastern End of Facility) – Pave Truck Access Area	10/31/06	01/09/06
23	All Material Transfer Points – Water Sprays and Enclosures	12/31/06	12/16/06
24	Submit record of fugitive dust control BMPs	04/30/07	4/30/07
24	Submit record of fugitive dust control BMPs	Every 6 months	In Compliance
25	Plant 1 - Stack Tests (PM2.5, PM10, NOx, SO2, CO) - Test Report	08/31/07 Within 90 days	8/28/07 10/22/07 10/21/08 9/15/10
25	Plant 2 - Stack Tests (PM2.5, PM10, NOx, SO2, CO) - Test Report	08/31/07 Within 90 days	8/28/07 10/22/07 11/12/08
29	Install Storm water Management Facility	12/31/06	12/22/06
30	Storm water BMPs		
	- Execute maintenance agreement with City	Not specified	01/22/07
	- Secure maintenance contract with SWMF vendor	Not specified	01/25/07
	- Obtain O&M manual from SWMF vendor	Not specified	12/13/06
- Provide maintenance records to City	Once per year	6/04/09 7/14/10	
31	Vegetate buffer between RAP pile and stream	Not Specified	12/22/06
32	On-Site Stream Bank Stabilization	Not Specified	12/04/06
37	Maintain Delivery times, locomotive use, unloading operations, RAP crusher operation	Daily	In Compliance

TABLE 3.2.5 Virginia Paving Company, Alexandria, Virginia Special Use Permit Compliance Schedule - Projects Completed by December 2012			
SUP Condition	Project Description	SUP Compliance Date	Completion Date
39	All On-Site Trucks & Equipment – Noise Level Sensing Backup Alarms	05/27/07	06/25/06
43	Plant 1 Cylinder Exhaust Port – Noise Reducing Muffler	11/30/06	07/20/06
43	Plant 2 Cylinder Exhaust Port – Noise Reducing Muffler	11/30/06	07/20/06
48	Remove tack deposits, repair pavement	Within 90 days of City notice	In Compliance
51	Replace Locomotive Engine	12/31/09	6/19/09
52	Report of non-operational air pollution control equipment	Immediately	In Compliance
53	Maintain Plant temperature readings of asphalt mix	Daily	In Compliance
54	Baghouses	Within 24 hours	In Compliance
	- Report of failures and pressure drops - Notify City of repairs	Upon completion	
55	Maintain all records for 5 years	Daily	In Compliance
56	Provide copies of all correspondence with Virginia DEQ	Not specified	In Compliance
58	Submit monthly report of production data	Within 2 weeks of month end	In Compliance
59	All compliance records - Before completion of all SUP projects (There after on an annual basis)	Starting 3/31/07 Once per quarter - within 30 days after quarter end 12/31/07 (Annually after project completion)	Reports submitted: 1/28/10
60	Facility Inspection - First two years of SUP approval (There after inspections will be at least on an annual basis)	Once per 6 months – starting 11/28/06 (Performed annually after the first two years)	Inspections performed 8/16/12

TABLE 3.2.5 Virginia Paving Company, Alexandria, Virginia Special Use Permit Compliance Schedule - Projects Completed by December 2012			
SUP Condition	Project Description	SUP Compliance Date	Completion Date
63	Hold community meetings, i.e., Community Open House	Twice per year - before 06/30 and 12/31 of each year	10/26/12
64	Provide and implement a comprehensive landscape plan	Not specified	9/07
73	Remove parking area from City ROW, or apply for encroachment or vacation	Not specified	On schedule
76	Establish a Virginia Paving Liaison Committee	Not specified	Final Meetings held 4/14/10

4. COMMUNITY ISSUES

The 24-hour VAP Complaint Hotline received fourteen complaints during this time period. The City received via email and/or telephone notification of these during this time period. All complaints originated in the Cameron Station and Summer's Grove areas. City staff investigations were conducted within hours of notification was received.

Date	Time	Nature of Complaint	Received By	Responder	Notes/Response
1 May 16, 2012	10:56 PM	Noise complaint	VAP Hotline	City Staff/VAP	Unverified- The complaint came from a resident of Summer's Grove. The City was immediately notified of the complaint received. VAP and City staff responded to the issue. This noise issue was not linked to the plant's operation. Virginia Paving Company was not verified as the source of the odor.
2 May 18, 2012	1:59 PM	Noise complaint	VAP Email	City Staff/VAP	Unverified- The hotline was not utilized. The complaint came from a resident of Summer's Grove. The VAP response the following Monday and provided the VAP hotline number. The City was immediately notified of the complaint received. Due to the delay in reporting, the complaint could not be verified.

3	July 09, 2012	12:07 PM	Landscape complaint	VAP Email	City Staff/VAP	Verified- The hotline was not utilized. The complaint came from a resident of Summer's Grove. The VAP responded with an email to address concerns about dying tree on the property. The City was immediately notified of the complaint received.
4	August 29, 2012	2:06 PM	Odor complaint	VAP Hotline	City Staff/VAP	Verified- The caller complained that he and his wife could smell an odor coming through their townhouse window and had smelled it for the past hour to hour and a half. The caller stated it was "not a burning smell and not a plastic smell it was more of a petroleum-like smell. The City was immediately notified of the complaint received. VAP was not immediately verified as the source of the odor but it is noted in the VAP log as a possible odor based on the conditions.
5	September 03, 2012	12:20 PM	Noise complaint	VAP Hotline	City Staff/VAP	Unverified- The caller stated that there was a noise issue in the general area of VAP. The City was immediately notified of the complaint received. Virginia Paving Company was not verified as the source of the noise.
6	September 16, 2012	9:30 PM	Odor complaint	VAP Hotline	City Staff/VAP	Unverified- The City Fire Department made a call to the hotline on 09/16/12 at 9:30 PM stating they had received a couple of calls from citizens complaining about the smell of natural gas. The caller was not named or the address of the complainants given. The Fire Department stated that the caller(s) mentioned that they thought it might be coming from the plant. The City was immediately notified of the complaint received. The plant was in operation at that time but no odor was detected and operations were normal. Natural gas usage was double checked early this morning and usage was not higher than normal (usually an indication

						of a leak). Virginia Paving Company was not verified as the source of the odor.
7	September 19, 2012	11:24 PM	Odor complaint	VAP Hotline	City Staff/VAP	Unverified- The caller said that she was "gagging" by the strong smell of asphalt she could smell at her home in Cameron Station. The City was notified of the complaint received. The complaint was investigated but Virginia Paving Company was not verified as the source of the odor.
8	September 20, 2012	3:27 PM	Odor complaint	VAP Hotline	City Staff/VAP	Unverified- The caller described the odor as "petro based." The caller stated the odor had been present for the last 3 hours. He stated he was not entirely sure if it was coming from Virginia Paving. The City was immediately notified of the complaint received. The complaint was investigated but Virginia Paving Company was not verified as the source of the odor. The Fire Marshal also added that the odor remained in the area until 6am.
9	September 23, 2012	10:46 PM	Odor complaint	VAP Hotline	City Staff/VAP	Verified- The caller said that the smell from the plant was absolutely horrible tonight and that he could not open his windows because it was so bad. The City was immediately notified of the complaint received. He stated that he woke up a relative of the City Manager who confirmed the smell of asphalt but did not know the individual's name. The complaint was investigated and city staff did verify the odor complaint at this time.
10	September 23, 2012	10:46 PM	Odor complaint	VAP Hotline	City Staff/VAP	Verified- The caller said that the smell of asphalt was "horrendous." The caller stated that he has allergies and that it was making him sneeze. He stated he smelled the odor last Wednesday, 09/19/12 as well. The City was immediately notified of the complaint received. The complaint was investigated and City staff did verify the odor

						complaint at this time. (This issue was not observed near the complainant's home but additional odor issues were verified a few blocks away.)
11	October 03, 2012	1:35 AM	Odor complaint	VAP Hotline	City Staff/VAP	Unverified- The complainant stated that it started 10 minutes prior to making the phone call. The City was immediately notified of the complaint received. The plant was not operating at the time of the call. Asphalt was being unloaded from silos, but blue smoke control was confirmed on and functioning properly. The complaint was investigated but Virginia Paving Company was not verified as the source of the odor.
12	October 16, 2012	9:40 PM	Odor complaint	VAP Hotline	City Staff/VAP	Verified- The call rolled over to the messaging service. The call was identified and returned approximately 25 minutes later. The City was immediately notified of the complaint received. VAP personnel talked to the complainant for an additional 25 minutes and called City staff back for a follow up. VAP personnel did state that the details to the complaint were in line with the startup time of the plant. The complainant verified that the odor had dissipated by the time of the return call. The complaint was investigated and it is noted that Virginia Paving Company may have been the source of the odor.
13	October 16, 2012	8:50 AM	Odor complaint	VAP Hotline	City Staff/VAP	Unverified- A resident of Cameron Station placed the call and stated that the odor had been in the area for a half hour or more. The City was immediately notified of the complaint received. VAP staff was just a couple of minutes away and shortly afterwards the complainant stated to VAP staff that the odor dissipated. The only noteworthy occurrence was the plant was receiving Asphalt cement at the time. The complaint was

						investigated but Virginia Paving Company was not verified as the source of the odor.
14	October 16, 2012	7:44 AM	Odor complaint	VAP Hotline	City Staff/VAP	Unverified- A resident of Cameron Station placed the call and stated that the odor had been in the area for about 20 minutes before making the call. He stated he started smelling it at 7:20 AM. The City was immediately notified of the complaint received. The complaint was investigated but Virginia Paving Company was not verified as the source of the odor.

The City requests that all complaints be called in immediately to the VAP 24-hour Hotline which can then be followed with calls to the City Nuisance Abatement hotline or City staff assigned to VAP. It is extremely difficult to investigate and validate complaints too long after the fact. Please share this information with members of the community so that complaints and concerns can be better investigated and resolved. The VA Paving 24-hour complaint hotline number remains the same (703) 906-9918. The City Nuisance Abatement hotline is (703) 836-0041 and City staff assigned to VAP is Julius Holmes. His contact information is: (703) 746-4069 office and email address: Julius.holmes@alexandriava.gov

5. Key Points of the New State Operating Permit (#NRO-108-12)

VDEQ on May 15, 2012 issued a stationary source permit to modify and operate an asphalt concrete plant to VAP for its Alexandria plant. This amended permit supersedes all other previous permits and conditions. The changes are included below:

5.1 Current changes to the Virginia Paving State Operating Permit

The list below summarizes the adopted changes to the Virginia Paving State operating permit. These changes were the result of additional equipment added in the production of recycled asphalt pavement (RAP). Much of the RAP that is processed at the onsite RAP plant is sized correctly for immediate reuse in the asphalt production process. Previously all the RAP was cycled through the RAP crusher numerous times to accurately resize the chunks of asphalt to the approximate sizes. This method was crude and involved multiple trips through the crusher while still leaving the finished product somewhat inconsistent. The RAP screen is rated at 400 tons per hour and reduces the amount of asphalt crusher by 65%-75%. This is accomplished by screening out smaller items that are previously sized for reuse. The net effects are fewer operating hours for the crusher, lower fugitive dust emissions and noise reduction in this area of the plant. The permit changes are reflected in new Condition 7 on page 5; revised Condition 29 and 30, on page 12; and new Condition 37.f on page 15.

- Condition 7: Addresses wet suppression monitoring at the RAP screener and requires that wet suppression methods are utilized when the screen is in use. There are also additional requirements to maintain a logbook of monthly inspection of the system, dates and any corrective actions that were taken.
- Revised Condition 29: Included the RAP screener as part of the existing RAP plant and sets the maximum opacity limit at 7% which is 3 percentage points lower.
- Revised Condition 30: Further required Virginia Paving to determine initial compliance for the RAP screener using the standard EPA Method 9, Emission Evaluations (VEE).
- Condition 37.f: This is used to update the onsite record keeping and monthly inspections for the plant and adds the RAP screener to that list.

6. SUP AMENDMENT UPDATE

As a result of a minor amendment in 2011, VAP switched the majority of the RFO (recycled fuel oil) operation over to natural gas for the 2012 paving season. As a result of the satisfactory compliance with the SUP, Condition 59 and Condition 60 have been placed on any annual schedule per the original SUP requirements. Condition 59 refers to compliance records submitted to the City that will be done annually moving forward and Condition 60 refers to comprehensive multi-departmental inspection that will be conducted at a minimum annually moving forward.

7. OPACITY SUMMARY FOR 2012

As a result of the plant's addition of new equipment, VAP was tasked with performing Visible Emissions Evaluations (VEE's) on the RAP plant and the newly installed screener. The most recent of these was conducted on June 07, 2012. The test parameters were established to determine initial compliance with the Visible Emissions Evaluations using EPA Method 9. The test results showed that the facility was in compliance with the City SUP emission limits and VDEQ state operating permit.

8. AMBIENT AIR QUALITY MONITORING

The City began routinely monitoring ambient air for particulate matter in 2006 at a new monitoring station located at Armistead Boothe Park, near the Samuel Tucker Elementary School in Cameron Station. Monitoring is being conducted to measure the ambient air concentrations of particulate matter less than 10 microns in diameter (PM10) in the surrounding Cameron Station monitor. This section of the report presents brief background information for this project, the analytical protocols used, and the monitoring results.

8.1 Background

The City initially conducted a short-term monitoring study in August of 2004. Two monitors were used for the study, one located at the Armistead Boothe Park and the other at the Ben Brenman Park. The study was designed to monitor PM-10 levels on days when its levels were

anticipated to be the highest, based on engineering best practice analysis of weather conditions and predicted wind direction. Monitoring on days when rainfall was predicted was avoided. The results from this short monitoring period in 2004 met the national ambient air quality. However, because they were higher than expected, the City installed a new long term monitoring station to measure PM-10 at Armistead Boothe Park, near the Samuel Tucker Elementary School. This brief report presents the data collected at this monitoring station since its inception, i.e. June 4, 2006.

8.2 Monitoring Results

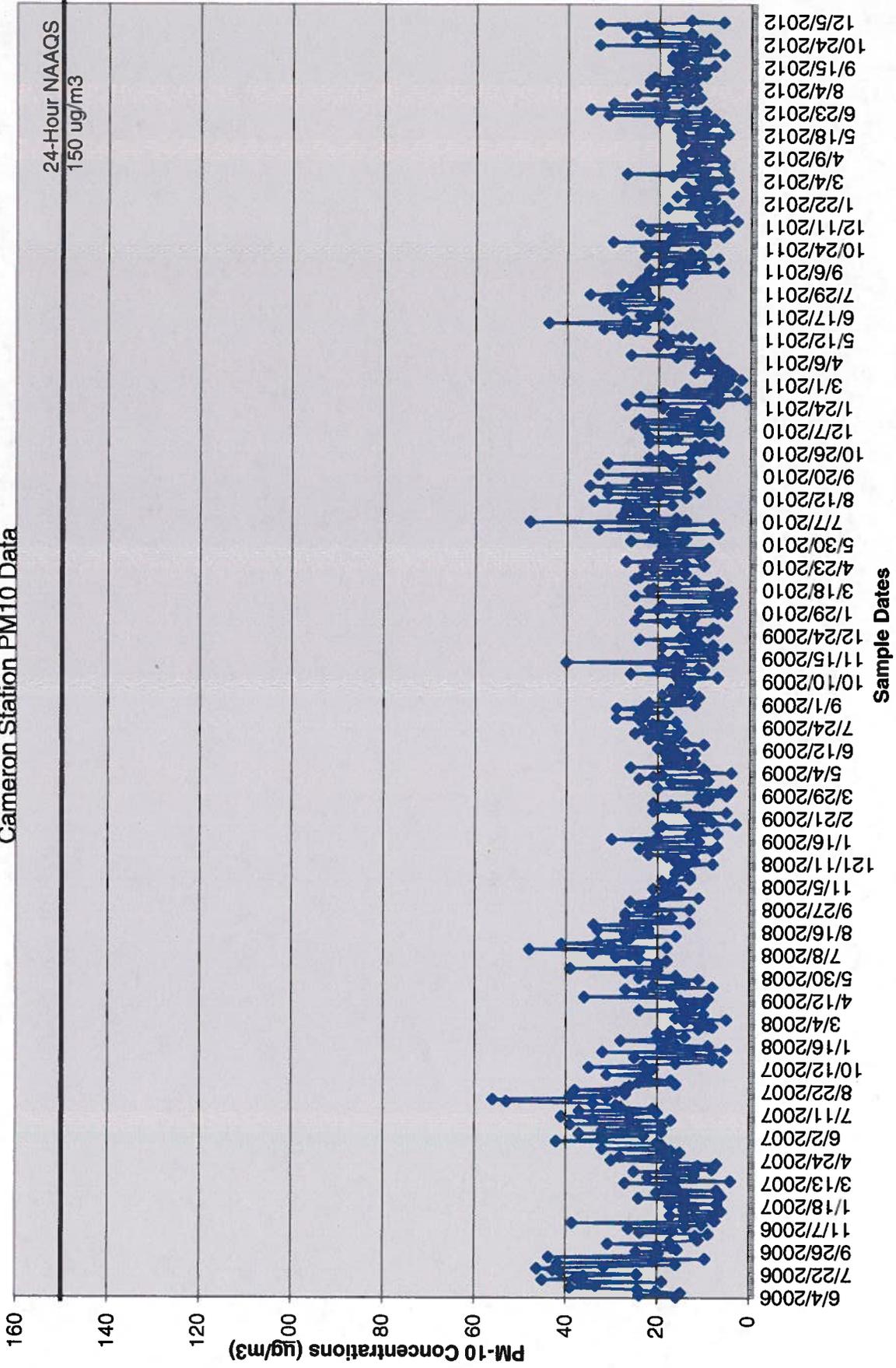
Table 8-1, summarizes the PM-10 monitoring data for 2012, showing the number of samples collected and the maximum values for each of the quarter in the year.

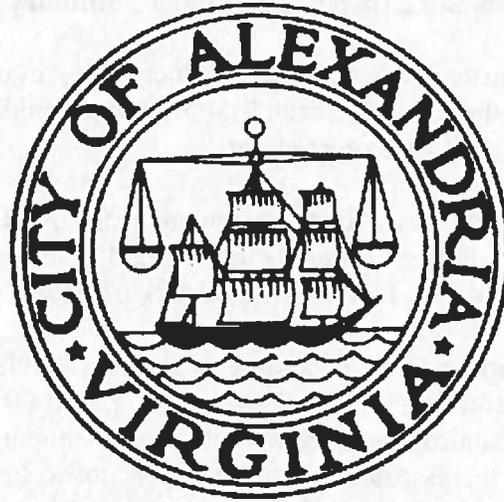
Table 8-1: Summary of PM10 Monitoring Results* Armistead Boothe Park Station			
2012 Quarter	Maximum Value ug/m3	Arithmetic Mean ug/m3	Number of Samples
1 st Quarterly	27	11.07	28
2 nd Quarterly	35	12.59	29
3 rd Quarterly	30	16.04	27
4 th Quarterly	33	16.4	20
2012 Annual *	35	13.20	104

**Information contained in this table is the most recently obtained from VDEQ (01/22/13)*

The following graphic summarizes the PM-10 monitoring results for the long-term monitoring station located at Boothe Park near the Samuel Tucker School. The 24-hour average PM-10 concentrations are compared to the EPA-specified National Ambient Air Quality Standard (NAAQS) of 150 $\mu\text{g}/\text{m}^3$. A comparison of the monitoring results with the NAAQS shows that the ambient PM10 concentrations at Cameron Station are below the NAAQS, as depicted in the chart below. As expected, the results show considerable day-to-day variability.

Cameron Station PM10 Data





Comprehensive Inspection Report

Virginia Paving Company

5601 Courtney Avenue, Alexandria, VA

August 16, 2012

Comprehensive August 16, 2012 Inspection Report Summary

The Multi-departmental onsite inspection was conducted on August 16, 2012. In attendance was staff from the City of Alexandria-OEQ, the Health Department, and the Fire department, Division of Code Enforcement.

Attendees at this year's comprehensive inspection are as follow: Julius Holmes (Environmental Specialist), Felton Gilliam (Planning and Zoning), Russell Furr (Fire Marshal), Chris Monahan (VAP), Joel Thomas (VAP), Christine Vineski (VAP).

The Virginia Paving Company (VAP) operates an asphalt manufacturing plant in Alexandria, Virginia, under a Special Use Permit (SUP #2010-0014). The SUP requires that various City departments conduct a comprehensive bi-annual inspection of the VAP plant. The comprehensive inspection consists of: (1) Technical Inspection Checklist, (2) On-site Plant Inspection, and (3) Visits to surrounding communities.

The Technical Inspection Checklist was developed by the City Department of Transportation and Environmental Services – Office of Environmental Quality (OEQ) to address SUP related documentation and compliance. The checklist reflects technical onsite inspections with full records review and plant operations.

Various conditions set forth in the SUP are monitored via review of records required to be kept by VAP. These records include hourly asphalt production and delivery logs, plant operating hours, daily fuel type usage, fuel delivery invoices, and the operating permit issued by the Virginia DEQ. A complete list of records that ALEX-OEQ monitors is included in the Technical Inspection Checklist. VAP has provided full access to their entire SUP related records during requests by OEQ.

The multi-departmental onsite inspection was conducted during day operations and consisted of accessing the various areas at the plant to ascertain general site conditions and any health hazards to the workers or the surrounding communities. Those areas included the record keeping office areas; the maintenance buildings; Plants 1 and 2; the pollution control devices such as the Blue Smoke Control System, installed on Plant 1 and 2; the conveyor systems, the recycling asphalt product pile, the storm water management system, the diesel locomotive, the asphalt heaters and storage tanks, and the FCC Environmental (currently owned by Siemens) oil recycling facility. Night operations were monitored by OEQ several times on a weekly basis from April to October.

OEQ also conducts visits to the surrounding communities during the day and at night when the VAP is producing asphalt. Communities of concern include Summers Grove, Cameron Station and the business area abutting the plant to the north. These communities have expressed environmental concerns related to VAP operations. Of particular concern are asphalt odors emanating from VAP, petroleum odors emanating from the FCC facility, particulate and fugitive dust emissions, and noise from trucks and trains especially at night. In addition to community visits to address these concerns, OEQ

monitors and addresses all citizen complaints received at the 24-hour hotline and/or received via other means, such as direct telephone and email contacts.

The VAP facility in Alexandria continues to satisfactorily implement the projects and procedures delineated in the SUP. During the August 16, 2012 inspection, Julius Holmes of the City's Office of Environmental Quality observed no items which needed to be addressed during the visit. Felton Gilliam from the Alexandria Planning and Zoning Department did not find any compliance issues during his inspection. There was no indication of mosquitoes during the inspection. Russell Furr (Deputy Fire Marshal) conducted an onsite inspection. As a result of his inspection, he submitted a post inspection list to VAP requesting minor corrections.

INSPECTION CHECKLIST - TECHNICAL Virginia Paving Company 5601 Courtney Avenue, Alexandria, Virginia			
		Inspection Dates	August 16, 2012
		Inspection Time	9 AM-12PM
		Inspection Performed by	Julius Holmes / Russell Furr/Felton Gilliam
		Inspector Initials	
RECORDS REVIEW			
1	Is a copy of the State Operating Permit issued by VDEQ kept on site and readily available to plant manager and environmental compliance personnel?	Y	Reviewed
2	Are copies of all reports/records required by VDEQ kept on site and readily available to plant manager and environmental compliance personnel?	Y	Reviewed
3	Is a copy of the Special Use Permit issued by City of Alexandria kept on site and readily available to plant manager and environmental compliance personnel?	Y	Reviewed
4	Are copies of all reports/records required by the City kept on site and readily available to plant manager and environmental compliance personnel?	Y	Reviewed
5	(a) Are copies of all correspondence with Virginia DEQ available on site? (b) Was a copy of every such correspondence submitted to the City?	Y Y	Reviewed
6	Operating Hours (a) Is there a complete on-site record of day/night shifts of asphalt production? (b) Is there a running total of night shifts during which asphalt was produced? (Night is defined as 8pm to 5am) (c) Is the running 12-month total number of night shifts less than 110? (d) Did the facility operate on any Code Purple or Code Maroon days?	Y Y Y N	Reviewed
7	Asphalt Production Records (a) Is there a complete on-site record of the tons of asphalt produced during every hour, day, month, and 12-month period of operation? (b) Is the maximum hourly production less than 1,000 tons? (c) Is the maximum nighttime (8pm to 5am) production less than 4,000 tons? (d) Is the maximum daily production less than 8,000 tons?	Y Y Y	Reviewed

	(e) Is the maximum production on a Code Red day less than 4,000 tons? (f) Is the running 12-month night production less than 275,000 tons? (g) Are all environmental projects required by SUP completed? (i) If NO, is the running 12-month total production less than 850,000 tons? (ii) If YES, is the running 12-month total production less than 980,000 tons?	Y Y Y N Y NA	
8	(a) For each asphalt delivery, is there a complete on-site record of the customer name, delivery date and time, and tons of asphalt delivered? (b) Was nighttime production delivered to non-government customers?	Y N	Reviewed
9	Low-Odor Additive Use (a) Are manufacturer guidelines on low-odor additive use available on site? (b) For each ton of asphalt produced, is there a complete on-site record of the quantity of low-odor additive used and quantity of asphalt cement used?	Y Y	Provided in weekly spreadsheet for Va Paving and Reviewed
10	No. 2 oil usage in hot oil heaters and drum dryers (a) Is there a monthly consumption record for the hot oil heaters? (b) Are all running 12-month totals for heater use less than 100,000 gals? (c) For every shipment, is there a record of sulfur content less than 0.05 wt%? (d) For every shipment, is there a record that fuel is on-road diesel quality? (e) On each heater, is there a sign indicating the use of #2 oil only as well as the use of only one heater at any time?	Y Y Y Y Y	Reviewed None have exceeded
11	Recycled oil usage in drum dryers (a) Is there a daily and monthly consumption record? (b) For every shipment, is there a record of sulfur content less than 0.5 wt%? (c) If sulfur content exceeds 0.4 wt%, is there a record of communication with fuel supplier to achieve 0.4 wt% sulfur. (d) For every shipment, is there a record of meeting other constituent limits? (Other limits include metals, halogens, PCB and flash point.) (e) Was any recycled oil used on Code Orange or Code Red days?	Y Y NA Y NA	Sulfur threshold not exceeded.
13	Plant 1 Blue Smoke Control for silo, load outs, conveyors (6-stage filtration) (a) Was capture and control system certified to be 99% efficient? (Performance Test Date: June 14, 2007) (b) Are manufacturer maintenance guidelines available on site? (c) Is there a record of maintenance/repair (filter replacement, etc.)? (Last Maintenance Date: 10/13/2009)	Y Y Y	Filter replacement has been preformed. Reviewed
14	Plant 2 Blue Smoke Control for silo, loadouts, conveyor (venting to burner) (a) Was capture & control system certified to be 99% efficient? (Performance Test Date: June 14, 2007) (b) Are manufacturer maintenance guidelines available on site? (c) Is there a record of maintenance/repair performed on this system? (Last Maintenance Date: 09/03/2012)	NA Y Y Y	Reviewed
15	Baghouse Controls (a) Was a performance test done on each baghouse in the last 2 years? Plant 1 Test Date: 2007, 2008 and 2011 Plant 2 Test Date 2007 and 2008 Lime Silo Test Date: NA (b) Is there a record of all tests showing TSP less than 0.03 gr/dscf?	Y	No Lime Silo in use. Lime silo has been removed from site.

	(c) Is there a record of all monthly opacity tests?	Y Y	
16	<p>Fugitive Emissions Controls</p> <p>(a) Is a copy of the fugitive dust BMP manual readily available on site?</p> <p>(b) Is there a record of opacity monitoring for RAP crusher showing < 10%?</p> <p>(c) Is there a record of twice-daily watering of every paved road?</p> <p>(d) Is there a record of once daily wet vacuuming of every paved road?</p> <p>(e) Is there a record of watering and vacuuming of other paved areas?</p> <p>(f) Is there a record of routine wetting or chemical stabilization of piles?</p> <p>(g) Is there a record of routine inspection of conveyor drop enclosures?</p> <p>(h) Were these records submitted to the City within the last six months?</p> <p>Last Submission Date: 1/27/2012</p>	N N Y Y Y Y Y N Y	Not required in SUP or state permit. Daily records for watering RAP were reviewed. The rap crusher wasn't operating during the site visit. It is now equipped with three water sprayers: one where rap enters the crusher and two at the end of the conveyors. The water truck operated once during the inspection. No opacity issues from the grounds or RAP crusher observed.
12	<p>Pollution Control Malfunctions</p> <p>(a) Was there any malfunction of any control measure for any pollutant?</p> <p>(b) Is there a record of these malfunctions (date, equipment, reason, etc.)?</p> <p>(c) Was a timely report submitted to the City for every malfunction?</p>	N NA NA	I have no records of recent malfunctions
17	<p>Stack Tests</p> <p>(a) Is there a record of stack tests on Plants 1 and 2 (PM2.5, PM10, NOx, SO2, CO)?</p> <p>Last Plant 1 Test Date: 2004, 2007, 10/21/08 and 7/6/2011</p> <p>Last Plant 2 Test Date: 2004, 2007 and 11/12/08</p> <p>(b) Were test reports submitted to the City within 90 days of test date?</p> <p>(c) Is there a record of plant mix temperature readings on a daily basis?</p>	Y NA Y	Recent stack tests were recently completed. Time elapsed was not expired.
18	<p>Storm water Management Facility</p> <p>(a) Is a copy of the SWMF BMP contract readily available on site?</p> <p>(b) Is a copy of the SWMF O&M Manual readily available on site?</p> <p>(c) Is there a record of vendor-performed or vendor-certified maintenance?</p> <p>Last Maintenance Date: (4/28/12 for the front and 11/28/2011 for the back)</p> <p>(d) Were maintenance records submitted to the City within the last one year?</p> <p>Submission Date: 4/08/12</p>	Y Y Y Y	Yearly Inspection performed
19	<p>Night Operations</p> <p>(a) During any night shift, was more than one dryer, one loader, one skid steer or one mobile crane operated?</p> <p>(b) Is there a record of all rail deliveries showing delivery date and time?</p> <p>(c) Is there a record of operating hours of locomotive engine, unloading operations and RAP crusher use? Were these operated at night?</p> <p>(d) Was any night delivery of RAP ever dumped on the top of the RAP pile?</p>	N Y Y/N N	

20	"Hotline" Phone Number (a) Is the "hotline" active? (b) Is the name of the responsible person provided to the City and community? (c) Is there a log of complaints received at this number? (d) Have all complaints been resolved to date?	Y Y Y *	All complaints investigated.
21	Is a copy of the City's BMP manual for automotive industries kept on site and readily available?	Y	
22	Is there a record of maintenance for the locomotive engine to prevent/repair oil, lubricant or fuel leaks?	Y	Maintenance by Estetor Rane.
23	Is a copy of the comprehensive landscape plan readily available on site?	Y	Copy on site since March 2007

PLANT INSPECTION

1	Asphalt Plant 1 (a) Was Plant 1 operational? (b) If YES, was the baghouse pressure gauge operating properly? (c) Was any visible smoke (other than water) observed from the stack? (d) Did the Blue Smoke control appear to be operating properly? (e) Was strong asphalt odor detected near the Plant 1? (f) Was the stack raised to 20-meter height? (g) What fuel was being burned in the drum dryer? Natural Gas	N	Baghouse magnetic value was 0.0. Plant was down for repairs.
2	Asphalt Plant 2 (a) Was Plant 2 operational? (b) If YES, was the baghouse pressure gauge operating properly? (c) Was any visible smoke (other than water) observed from the stack? (d) Did the Blue Smoke control appear to be operating properly? (e) Was strong asphalt odor detected near the Plant 2? (f) Was the stack raised to 20-meter height? (g) What fuel was being burned in the drum dryer? None	N	Plant 2 was not in operation during inspection.
3	Asphalt Storage Tanks (a) Were tank vent condensers/steel wool filters appear to be effective? (b) Was strong asphalt odor detected near the storage tanks?	Y N	The vent condensers appeared to be effective.
4	Hot Oil Heaters (a) Was either of the two hot oil heaters operational? (b) If YES, was the other hot oil heater shut down? (c) Was there a sign clearly indicating that only one heater is allowed to operate at any time? (d) Was the stack raised to 6-meter height? (e) What fuel was being burned in the heater? Natural Gas	Y Y Y Y Y	
6	Fugitive Dust Emissions (a) Was there evidence of watering/vacuuming of paved roads and surfaces? (b) Was the RAP crusher operational? (c) Were any visible emissions observed from the RAP crusher? (d) Did transfer point enclosures appear to be effective? (e) Did water sprays appear to be effective? (f) Based on general observation, did the facility appear to be following the fugitive dust BMPs?	Y Y N Y Y Y	Crusher did not operate at night. The rap crusher wasn't operating during the day site visit. It is equipped with three water sprayers: one where rap enters the crusher and two at the end of the conveyors. The water truck operated during the inspection. No opacity

			issues from the grounds or RAP crusher observed.
7	<p>Storm water Management Facility</p> <p>(a) Did the SWMF appear to be operating properly?</p> <p>(b) Was there evidence of sediments or petroleum products in the discharge?</p>	Fair N	The storm water system contains ~120 filters: 100 located in the rear of the property and 20 in the front. Outfall monitoring is performed on a quarterly basis. The water samples taken from the rear outfall were free of sediment and petroleum products. This system needs scheduled maintenance performed.
8	<p>RAP / Asphalt Pile / Backlick Run</p> <p>(a) Is the asphalt pile a minimum of 35 feet from the stream?</p> <p>(b) Is access to the RAP pile blocked at night?</p> <p>(c) Was there any evidence of RAP deposited at the top of the pile during night?</p> <p>(d) Is the stream bank properly stabilized?</p> <p>(e) Is the height of the asphalt pile on Parcel B lower than the height of the South Van Dorn Bridge?</p>	Y N N Y Y	There have been nights that the rap pile has been left open in recent months.
9	<p>Noise</p> <p>(a) Were any amplified sounds audible at the property line?</p> <p>(b) Was there excessive tailgate banging during truck unloading?</p> <p>(c) Was there excessive use of engine brakes?</p> <p>(d) Are there signs clearly advising truck drivers to minimize tailgate banging and use of engine brakes?</p> <p>(e) Is the truck route properly marked to minimize backup alarms?</p> <p>(f) Do trucks have ambient noise-level sensing backup alarms?</p> <p>(g) Is the RAP crusher shut down at night?</p> <p>(h) During night operation, is only one dryer unit, one loader, one skid steer and one mobile crane operating?</p> <p>(i) Is the locomotive engine taken out of service at night?</p> <p>(j) Was a train delivery received at night? If YES, did the unloading wait until daytime?</p> <p>(k) Are the noise reducing mufflers on plant cylinder exhausts effective?</p> <p>(l) Are there signs on property to limit engine idling to a maximum of five minutes?</p>	N N N Y Y Y Y Y Y Y Y Y	All equipment owned by Va Paving is in compliance.
10	<p>(a) Were automotive fluids (oils, lubricants and antifreeze) prevented from being disposed on the ground?</p> <p>(b) Were automotive fluids (oils, lubricants and antifreeze) prevented from being disposed in the storm or sanitary sewers?</p> <p>(c) Were equipment and automotive repairs found to occur inside building?</p>	N N Y	Teksolv II is now utilized (in lieu of Safety Kleen) in the parts washer. It is less hazardous than Safety Kleen. Many of the repairs are done at a different location.

11 Lighting

- | | |
|---|---|
| (a) Were only the necessary lights turned on during night operations? | Y |
| (b) Are all lights shielded and pointed downward during use? | Y |



Stormwater BMP Inspection

Quality Pipe Cleaning Co., Inc.
PO Box 2200
Centreville, VA 20122
Phone 703.641.0111
Fax 703.818.8528

REPORT CONTENTS

This report contains information regarding the results off the BMP(s) inspected at the referenced site.

The following information is provided for each BMP:

Inspection Date
Inspector Information
Inspection Weather Conditions
BMP Location
BMP Designation, Type and Configuration
Sediment, Water, and Hydrocarbon Levels
BMP Maintenance Condition
BMP Physical Condition
Additional Comments and Observations
Inspection Photos (where applicable)
Recommended Action
Certificate of Compliance (if applicable)

INSPECTION SUMMARY

Based on the results of the inspected BMP(s), the following action is recommended:

- All inspected BMPs are operating within manufacturer's established specifications. **No further action is required at this time.**
- Repairs to one or more off the inspected BMPs is required. See report specifics for details.
- Routine maintenance of one or more of the inspected BMPs is required. See report specifics for details.



PROJECT INFORMATION

Name Virginia Paving Project# 11/28/2011
Address 5601 Courtney Ave
Alexandria, VA 22304

INSPECTION DETAILS

Inspector Sterling Stormwater Mgmt. System ID 0.01
Date 11/28/11 GPS Coordinates N38.802917
W77.1325
Weather Dry

SYSTEM TYPE Media Filtration System MFS MEDIA TYPE Perlite
CONFIGURATION Vault CARTRIDGE# 18
SIZE 8x24

Sediment Depth - Inlet Bay 4' Pronounced Scum Line?
Sediment Depth - Cartridge Bay 4' Excessive Hydrocarbons?
Sediment Depth - Top of Cartridges 0
Water Level - Cartridge Bay 0

Physical Condition of Unit: Unit appears to be in good working condition.

Inspector Comments:

Maintenance Required? No Repairs Required?

INSPECTION AUTHENTICITY

This hereby certifies that the information contained in this report is accurate and was obtained using accepted industry practices.

By: Thomas Buchwald

Company: Quality Pipe Cleaning Co., Inc.

Signature:

Date: 1/18/12

Title: National Maintenance Manager



Stormwater BMP Inspection Report

INSPECTION PHOTOS



STORMWATER TREATMENT SYSTEM CERTIFICATE OF COMPLIANCE



Virginia Paving
5601 Courtney Ave
Alexandria, VA 22304

Let it be known that the CONTECH stormwater management system was inspected by a qualified professional at a frequency and in a manner consistent with the manufacturer's guidelines for general inspection and maintenance. Results of the inspection were used to determine if additional maintenance activities such as cleaning and/or repair of the system was necessary. The results of the inspection concluded that maintenance was not required on the system.

Therefore, based on these activities and by signed authorization below, this hereby certifies that the CONTECH stormwater management system at the above referenced location has met the requirements for maintenance compliance as specified by the manufacturer for a period of one year, from July 2010 to July 2011.



CERTIFICATE AUTHORIZATION

Thomas Buchwald
National Maintenance Manager
Quality Pipe Cleaning Co., Inc.
1/18/12



**VIRGINIA
PAVING
COMPANY**

Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/D

Alexandria and Occoquan Branch Office

P.O. Box 22247

Alexandria, VA 22304

(703) 751 7100

(703) 751 4249 Fax

January 6, 2012

Virginia Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193

RE: Virginia Paving Company – 2011 Discharge Monitoring Reports (DMRs)

To Whom It May Concern:

Please find enclosed December 2011 Discharge Monitoring Report (DMR) for seven of Virginia Paving Company's facilities. These include the following:

- Virginia Paving Company Alexandria – VAR051466
- Virginia Paving Company Chantilly – VAR050863
- Virginia Paving Company Loudoun – VAR050922
- Virginia Paving Company Occoquan – VAR050902
- Virginia Paving Company Stafford Shop & Office – VAR051659
- Virginia Paving Company Fredericksburg – VAR051012
- Virginia Paving Company Garrisonville – VAR050919

Please note that 4 of these sites: Chantilly, Stafford shop & office, Alexandria, and Fredericksburg had levels above benchmark targets. Two of these sites: Stafford shop & office and Fredericksburg have since demonstrated improvements via samples with results below our benchmark targets, which have also been included with this submission.

Measures have been taken onsite and documented in the storm water pollution prevention plans to improve existing BMPs. There was off site influence at the Alexandria and Chantilly locations that likely contributed to elevated levels. In September, Alexandria plant was inundated by floodwaters that fouled our storm water management facility and deposited large amounts of sediment throughout the site. Maintenance and repairs are mostly complete that will deliver improved water quality exiting the site.

The Chantilly permit requires 2 sample types per year: Annual Benchmark monitoring and Bi-annual TMDL Waste Load Allocation monitoring. The first result was below the benchmark target while the second result was slightly above the benchmark target. As a result, equipment has been dedicated and more aggressive/focused road sweeping techniques were implemented.

We will be watching this associated outfall of concern to see if new BMPs are needed in the future.

Very truly yours,



Chris D. Monahan
Environmental Manager

CDM

Enclosure

cc: Cheshire-GAW, MAS, MCC, DBO, RB, RLM, DMH, JAM, MET, CMV

DEPT. OF ENVIRONMENTAL QUALITY
(REGIONAL OFFICE)
Northern Regional Office
13901 Crown Court
Woodbridge
VA 22193
(703) 583-3800

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
VIRGINIA POLLUTANT DISCHARGE ELIMINATION SYSTEM (VPDES)
DISCHARGE MONITORING REPORT (DMR)

NOTE: READ PERMIT AND GENERAL INSTRUCTIONS BEFORE COMPLETING THIS FORM

TYPE: STORM WATER

BENCHMARK MONITORING

VAR051466
PERMIT NUMBER

001
OUTFALL NO.

PERMITTEE NAME

Virginia Paving Company Alexandria
Plant

5601 Courtney Ave.
Alexandria, VA 22304

FACILITY
LOCATION

5601 Courtney Ave
Alexandria, VA 22304

CONTACT PERSON

Alexandria VA 22304

TELEPHONE

CHRISTINE M. VINESKI
(703) 751-7100

Check One	MONITORING PERIOD			
	YEAR	MONTH	DAY	YEAR
	2009	July	1	2009
	2010	January	1	2010
	2011	January	1	2011
	2012	January	1	2012
	2013	January	1	2013

PARAMETER	CONCENTRATION			NO. EX.	SAMPLE TYPE
	MINIMUM	AVERAGE	MAXIMUM		
004 TSS	*****	*****	630	1	GPAB
	*****	*****	100		GRAB

Comments:

STORM EVENT INFORMATION					
DATE	YR	MO	DAY	HRS	MIN
	11	12	06	7	0
DURATION					
	0.29				
RAINFALL TOTAL (IN.)					
	0.29				
PRECEDING EVENT					
	6 17				

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY KNOWLEDGE OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS TO THE BEST OF MY KNOWLEDGE AND BELIEF TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION.

PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

CHRIS D. MONAHAN
TYPED OR PRINTED NAME

SIGNATURE

Chris Monahan

DATE

2012 1 6

YEAR

MO.

DAY

DEPT. OF ENVIRONMENTAL QUALITY
(REGIONAL OFFICE)
Northern Regional Office
13901 Crown Court
Woodbridge
(703) 583-3800
VA 22193

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
VIRGINIA POLLUTANT DISCHARGE ELIMINATION SYSTEM (VPDES)
DISCHARGE MONITORING REPORT (DMR)

NOTE: READ PERMIT AND GENERAL INSTRUCTIONS BEFORE COMPLETING THIS FORM

TYPE: STORM WATER
BENCHMARK MONITORING

VAR051466	002
PERMIT NUMBER	OUTFALL NO.

Check One	MONITORING PERIOD					
	YEAR	MONTH	DAY	YEAR	MONTH	DAY
<input type="checkbox"/>	2009	July	1	2009	December	31
<input checked="" type="checkbox"/>	2010	January	1	2010	December	31
<input type="checkbox"/>	2011	January	1	2011	December	31
<input type="checkbox"/>	2012	January	1	2012	December	31
<input type="checkbox"/>	2013	January	1	2013	December	31

PERMITTEE NAME _____
FACILITY NAME Virginia Paving Company Alexandria
ADDRESS Plant
The Lane Construction Corporation 5601 COURTNEY AVE.
PO-Box-9666 ALEXANDRIA, VA
Mobern VA-22304
5601 Courtney Ave

CONTACT PERSON ALEXANDRIA VA 22304
TELEPHONE CHRISTINE M. VINESKI
(703) 751-7100

PARAMETER	CONCENTRATION			NO. EX.	SAMPLE TYPE
	MINIMUM	AVERAGE	MAXIMUM		
004 TSS	*****	*****	552	1	GRAB
REQUIREMENT	*****	*****	100		GRAB

Comments:

STORM EVENT INFORMATION					
DATE	YR	MO	DAY	HRS	MIN
	11	12	06		
DURATION	HRS	MIN			
	7	8			
RAINFALL TOTAL (IN.)	0.29				
PRECEDING EVENT	DAYS	HRS			
	6	17			

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY JUDGMENT OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS TO THE BEST OF MY KNOWLEDGE AND BELIEF TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION.

PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

CHRIS D. MONAHAN
TYPED OR PRINTED NAME

Chris Monahan
SIGNATURE

DATE
2012 1 6
YEAR MO. DAY

STERLING

Stormwater Maintenance Services

Stormwater System Compliance Report

GENERAL INFORMATION

Site Name & Location:	Virginia Paving - Alexandria, VA	Number & Type of Systems: SYSTEM 1 StormFilter with 97 ZPG Cartridges SYSTEM 2 StormFilter with 18 ZPG Cartridges
Inspection Performed By:	Sterling Stormwater Maintenance Services, LLC	
Number of Pages in Report:	4	

INTRODUCTION

This report has been generated by STERLING Stormwater Maintenance Services, LLC. The information provided in this report is not an evaluation as to the performance of the stormwater systems and STERLING Stormwater Maintenance Services accepts no responsibility relating to the performance of these systems. This information is provided solely as an assessment of the condition of the stormwater systems as it pertains to maintenance. Recommendations and next actions are based on the manufacturer's published literature or the generally accepted practice if applicable.

This report is formatted to provide an overall summary of the compliance activities on the cover page as well as provide more indepth compliance details for each system in the content of the report. A site overview is provided on page 2 of the report.

COMPLIANCE SUMMARY

SYSTEM 1: StormFilter System with 97 ZPG Cartridges

An inspection of this system was performed on 3/28/2012. The results of the inspection indicated that maintenance is not needed at this time. A minor repair was completed during the inspection. Specifically, two of the cartridges were found loose in the system and were re-secured to the underdrain piping during the inspection.

SYSTEM 2: StormFilter System with 18 ZPG Cartridges

Maintenance of this system was performed on 3/28/2012. Maintenance consisted of cleanout of accumulated material, removal of existing filter cartridges, and installation of new filter cartridges. No further maintenance activities are needed at this time.

The next annual inspection should be performed in March of 2013.

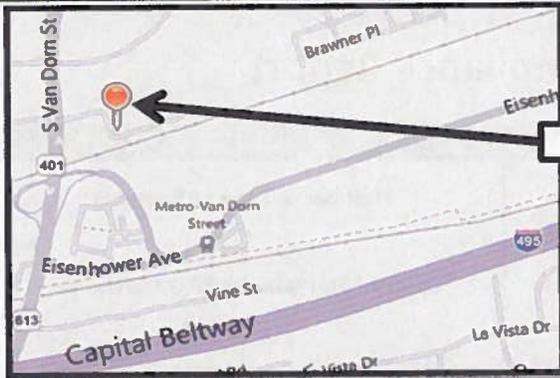
REPORT CERTIFICATION

This hereby certifies that the information contained in this report is accurate and was obtained using accepted industry practices.

Inspection Company:	Sterling Stormwater Maintenance Services, Inc
Inspector's Name:	Thomas P. Gorrivan
Certifications:	Certified Professional in Stormwater Quality Preferred Inspector and Maintenance Provider for CONTECH Construction Products, Inc.

Signature:		Date:	4/8/2012
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Site Map and Location of Systems:



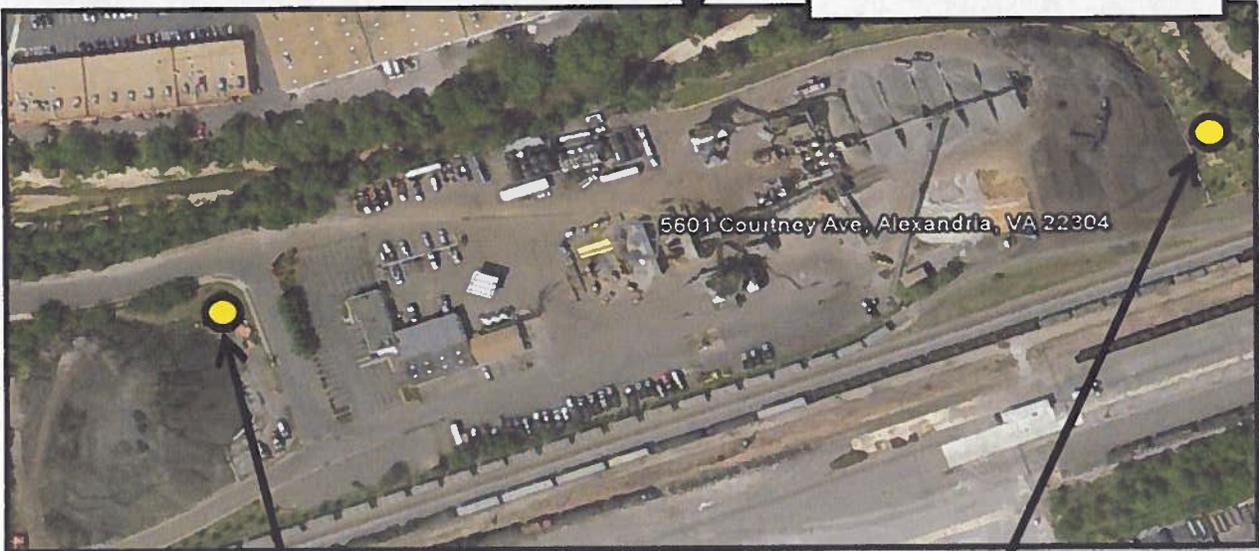
Site Location

Site Name - Virginia Paving

**Site Address - 5601 Courtney Ave,
Alexandria, VA 22304**

Site Summary

There are two StormFilter systems located on this site. The location of each system is shown on the aerial photo below. A description of each system is provided in the caption.



System 2 - StormFilter with 18 ZPG cartridges.

System 1 - StormFilter with 97 ZPG cartridges.



See page 4 for compliance activity details.



See page 3 for compliance activity details.

STERLING

Stormwater Maintenance Services

StormFilter System #1 Compliance Report

Location and System Parameters:

Site Name:	Virginia Paving	Site Address:	5601 Courtney Ave, Alexandria, VA 22304
8MP Type:	StormFilter	Installation Date:	11/8/2006
# of Cartridges:	97 ZPG Cartridges	Last Maintenance Date:	Fall 2011

Compliance Activity Parameters

Date:	3/28/2012	Time:	12:00 PM
Weather:	Sunny	Temperature:	66°F

Compliance Summary

An inspection of this system was performed on 3/28/2012. The results of the inspection indicated that maintenance is not needed at this time. A minor repair was completed during the inspection. Specifically, two of the cartridges were found loose in the system and were re-secured to the underdrain piping during the inspection. Detailed inspection findings and system photos are provided below.

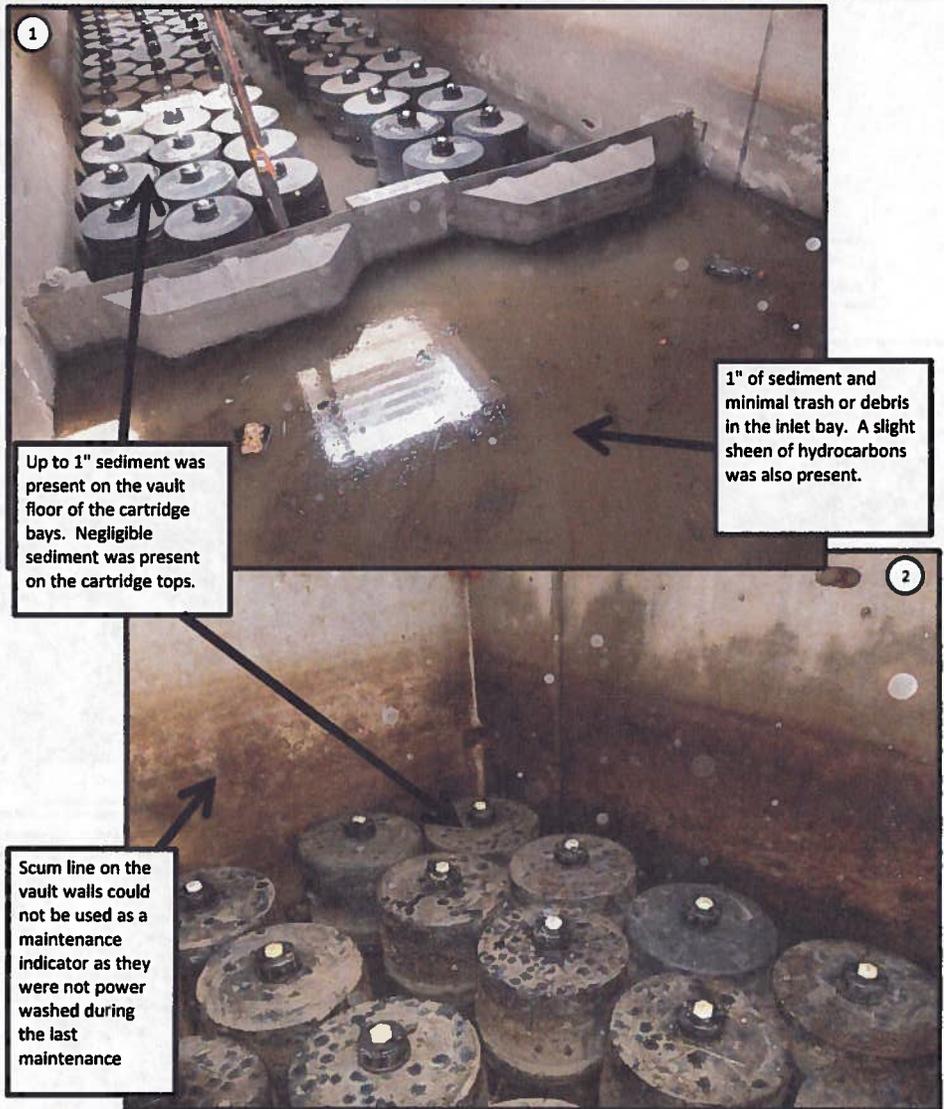
Detailed Findings and System Photos:

Photos #1 and #2 show the upper and lower cartridge bays for this system, respectively. The inlet bay is located upstream of the upper cartridge bay and can be seen in photo #1.

A measurement of the sediment depth in the inlet bay revealed that approximately 1" of sediment has accumulated. This represents only a minimal percentage of the sediment accumulation capacity for the inlet bay. The standing water depth in the inlet bay measured 33". This level of standing water is appropriate for the inlet bay of this system. In addition to the sediment accumulation, a slight sheen of hydrocarbons and a small amount of trash was also present in the inlet bay. The only concern with the inlet bay of this system was that the flow dissipaters installed at the outlet of the inlet bay were damaged. As these components are not critical to the performance of the system no repairs are necessary until the next maintenance event.

The upper and lower cartridge bays for this system are hydraulically connected and function as one bay. The condition of the lower bay was moderately worse than that of the upper bay however both bays were in acceptable condition. The sediment accumulation and standing water level on the vault floor of both bays measured no more than 1". Negligible sediment accumulation was present on the cartridge tops in either bay and minimal trash, debris, or hydrocarbons were found.

It should be noted that the scum lines on the vault walls of the cartridge bays could not be used as an indicator for maintenance as the walls were not power washed from the last maintenance cycle.



Manufacturer's Recommendations and Next Actions:

The key manufacturer recommendations for the StormFilter suggest system cleaning and cartridge replacement may be needed if the following are true: A. Sediment accumulation on the vault floor is greater than 4", B. Sediment accumulation on the cartridge tops is greater than 1/4", C. Greater than 4" of water exists in the system for longer than 24 hours after a storm event, and D. the height of the water scum line on the vault walls is greater than 6" higher than the tops of the cartridges.

Based on these guidelines, no additional maintenance activities are required at this time. The next annual inspection should be performed in March of 2013.

STERLING

Stormwater Maintenance Services

StormFilter System #2 Compliance Report

Location and System Parameters:

Site Name:	Virginia Paving	Site Address:	5601 Courtney Ave, Alexandria, VA 22304
BMP Type:	StormFilter	Installation Date:	11/13/2006
# of Cartridges	18 ZPG Cartridges	Last Maintenance Date:	Unknown

Compliance Activity Parameters:

Date:	3/28/2012	Time:	8:00 AM
Weather:	Sunny	Temperature:	66°F

Compliance Summary:

Maintenance of this StormFilter System was performed on 3/28/2012. Maintenance of this system consisted of cleanout of accumulated material, removal of existing filter cartridges, and installation of new filter cartridges. Photos taken before, during, and after this maintenance activity are provided below. No further maintenance activities are needed at this time. The next annual inspection of this system should be performed in March of 2013.

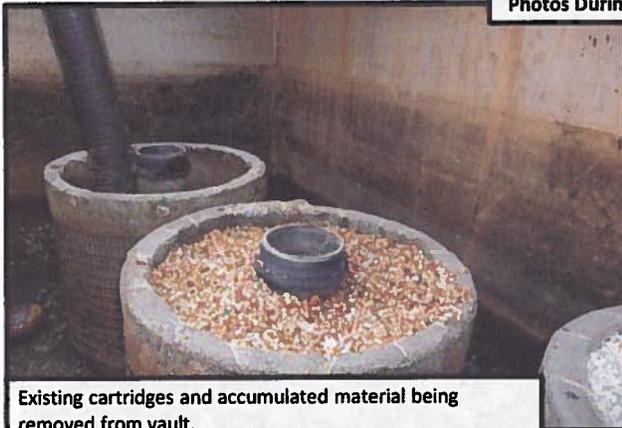
Maintenance Verification Photos:

Photo Before Maintenance



Photos shows a view of the system as seen from the surface prior to maintenance being performed.

Photos During Maintenance



Existing cartridges and accumulated material being removed from vault.



Vault clean and empty.

Photos After Maintenance



Photos show the condition of the system after the new cartridges have been installed. Maintenance is Complete!



NRO-108-12

COMMONWEALTH of VIRGINIA**DEPARTMENT OF ENVIRONMENTAL QUALITY****NORTHERN REGIONAL OFFICE**13901 Crown Court, Woodbridge, Virginia 22193-1453
(703) 583-3800 Fax (703) 583-3821www.deq.virginia.govDouglas W. Domenech
Secretary of Natural ResourcesDavid K. Paylor
DirectorThomas A. Faha
Regional Director

May 15, 2012

**Mr. David M. Horton
Plant Manager
Virginia Paving Company
5601 Courtney Avenue
Alexandria, Virginia 22304**

Registration No.: 70579

Dear Mr. Horton:

Attached is an amended minor New Source Review permit to Modify and Operate an asphalt concrete plant, in accordance with the provisions of the Commonwealth of Virginia's Regulations for the Control and Abatement of Air Pollution. This permit supersedes your minor New Source Review permit to Modify and Operate dated November 17, 2011. Permit changes are reflected in new Condition 7 on page 5; revised Conditions 29 and 30, on page 12; and new Condition 37.f. on page 15.

This permit contains legally enforceable conditions. Please read all permit conditions carefully as failure to comply may result in appropriate enforcement and civil charges.

The Department of Environmental Quality (DEQ) deemed the application complete on April 30, 2012, and has determined that the application meets the requirements of 9 VAC 5-80-1270 A for an administrative amendment, and 9 VAC 5-80-1280 A, B and C for a minor amendment to a new source review permit.

This permit approval to modify and operate shall not relieve Virginia Paving Company of the responsibility to comply with all other local, state, and federal permit regulations.

The hot mix asphalt and RAP processing plant equipment are subject to the federal New Source Performance Standards (NSPS), as stated in 40 CFR 60 Subparts I, and OOO, which have been incorporated in the permit. It should be noted also that the proposed engine (Ref. No. E:S) for the new RAP screen (Ref. No. RAP:S) is an affected facility under 40 CFR 60, NSPS, Subpart IIII and 40 CFR 63, National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT) Subpart ZZZZ. However, the DEQ to date has not taken delegation for those federal Regulations. Since the diesel engine is required to comply with certain federal emission standards and operating limitations over the useful life of the unit, the DEQ advises you, as the owner/operator of the unit, to review the NSPS and MACT to ensure compliance with applicable emission standards, operational limitations, and the monitoring, notification, reporting and recordkeeping requirements. Applicable notifications shall be sent to EPA, Region III. Both the NSPS and MACT can be found at <http://ecfr.gpoaccess.gov/>

Mr. David M. Horton
Virginia Paving Company
DATE
Page 2

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within thirty days after this case decision notice was mailed or delivered to you. 9 VAC 5-170-200 provides that you may request direct consideration of the decision by the Board if the Director of the DEQ made the decision. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have thirty days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

A copy of the results of performance test required by 40 CFR 60, Subparts I and OOO, shall be sent to:

Associate Director
Office of Air Enforcement (3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

If you have any questions concerning this permit, please contact the regional office at 703.583.3858.

Sincerely,



Terry H. Darton
Regional Air Permit Manager

TAF/THD/AK/12-108-mnsr

Attachments: Permit
Source Testing Report Format

cc: Director, OAPP (electronic file submission)
Chief, Air Enforcement Branch (3AP20), U.S. EPA, Region III
Division Chief for Environmental Quality, City of Alexandria
Regional Air Compliance Manager (electronic file submission)



NRO-108-12

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

13901 Crown Court, Woodbridge, Virginia 22193-1453

(703) 583-3800 Fax (703) 583-3821

www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

STATIONARY SOURCE PERMIT TO MODIFY AND OPERATE

**This permit includes designated equipment subject to
New Source Performance Standards (NSPS) and
National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT)**

This permit supersedes your permit dated November 17, 2011.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia
Regulations for the Control and Abatement of Air Pollution,

Virginia Paving Company
5601 Courtney Avenue
Alexandria, Virginia 22304
Registration No.: 70579

is authorized to modify and operate

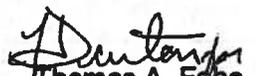
an asphalt concrete plant

located at

5601 Courtney Avenue
City of Alexandria, Virginia 22304

in accordance with the Conditions of this permit.

Approved on: May 15, 2012


Thomas A. Faha
Regional Director

Permit consists of 19 pages.
Permit Conditions 1 to 47.

INTRODUCTION

This permit approval is based on the permit applications dated January 4, 2007, January 26, 2007, August 12, 2011, and October 7, 2011; and supplemental information dated February 28, 2007, May 10, 2007, May 15, 2007, December 27, 2007, August 3, 2009, July 7, 2011; April 30, 2012; and stack test reports dated April 30, 2009, July 21, 2010, and August 8, 2011. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-80-1110 (definitions) and 9 VAC 5-10-20 of the State Air Pollution Control Board's (Board) Regulations for the Control and Abatement of Air Pollution (Regulations). The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the Department of Environmental Quality (DEQ) or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. **Equipment List** - Equipment to be permitted at this facility consists of the following:

New Equipment				
Reference No.	Equipment Description	Rated Capacity	Federal Requirements	
RAP:S	A screening unit, McCloskey model R155, for the Recycled Asphalt Pavement (RAP) operation	400 tons/hour	NSPS, subpart 000	
E:S	Caterpillar C4.4 ACERT TA diesel engine that powers the RAP screening unit (Ref. RAP:S)	121 brake horsepower (bhp)	NSPS, subpart IIII and MACT subpart JJJJ	

Equipment permitted prior to the date of this permit				
Reference No.	Equipment Description	Rated Capacity	Federal Requirements	Original Permit Date
P:1	A counter flow drum mix asphalt concrete plant, CMI model STD600 with Hauck Eco Star II model 175B w/low NOx burner	600 tons/hour hot mix asphalt concrete product	NSPS, subpart I	2/17/2010
H:1	Asphalt cement heater, Gencor – Hy Way model HYTGO-340 hot oil heater	3.4 million Btu/hour	-	2/17/2010
H:2	Asphalt cement heater, Heatec HC-120 hot oil heater (backup to H:1)	1.5 million Btu/hour	-	2/17/2010
P:2	A counter flow drum mix asphalt concrete plant, CMI model STD400 with Hauck Eco Star burner	400 tons/hour hot mix asphalt concrete product	NSPS, subpart I	2/17/2005, 7/20/2006
RAP:C	A recycled asphalt product processing plant	125 tons/hour	NSPS, subpart OOO	2/17/2005, 7/20/2006

Equipment Exempt from Permitting			
Reference No.	Equipment Description	Rated Capacity	Exemption Citation
1, 2, 3	Three liquid AC/asphalt storage tanks	30,000 gallons capacity, each	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8.
4	Asphalt Emulsion/Tack storage tank	13,000 gallons, capacity	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8.
5	Diesel fuel storage tank	10,000 gallons capacity	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8.
6	Recycled fuel oil storage tank	13,000 gallons capacity	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8.
7	Asphalt (Calibration) tank	1,000 gallons capacity	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8.
8	Unleaded gasoline storage tank at dispensing facility	6000 gallons capacity	9 VAC 5-40-5220 E., F., or 9 VAC 5-80-1320 B.8.
9,10	Two diesel fuel oil storage tanks	6000 gallons capacity, each	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8.
11	Waste oil storage tank	275 gallons capacity	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8.
12	Motor oil above ground storage tank	500 gallons capacity	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8.
13	ATF above ground storage tank inside the shop	500 gallons capacity	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8.
14, 15	Two heating oil storage tanks (for office building)	500 gallons capacity, each	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8.

16+	Petroleum, oils, lubricating fluids storage tank	55 gallons capacity	9 VAC 5-40-5200 C., or 9 VAC 5-80-1320 B.8
100-A	Parts cleaning machine, Purewash S620	40 gallons capacity	9 VAC 5-80-1320 D., Note: Subject to 9 VAC 5-40-6820 to 9 VAC 5-40-6960

Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit unless the specifications are needed to form the basis for one or more of the other terms or conditions in the permit. (9 VAC 80-1180 D 3)

2. **NOx Emission Controls: Asphalt Plant Dryer** - Emissions of nitrogen oxides (as NO₂) from the dryer for CMI model STD600 asphalt plant (Ref. # P:1) shall be limited through the use of a low NOx burner, Hauck Eco Star II model 175B; and the dryer for CMI model STD400 asphalt plant (Ref. # P:2) shall be limited through the use of low NOx burner, Hauck Eco Star. The emissions from use of natural gas as burner fuel for the CMI model STD600 asphalt plant (Ref. # P:1) shall be controlled further by the use of flue gas recirculation. The equipment shall be provided with adequate access for inspection and shall be in operation when the drum dryer is operating.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

3. **Emission Controls: Asphalt Plant** - Particulate emissions from each drum dryer (Ref. # P:1 and P:2) shall be controlled by a fabric filter baghouse. The fabric filter shall be provided with adequate access for inspection and shall be in operation when the drum dryer is operating.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

4. **Monitoring Devices: Fabric Filter Baghouse** - Each drum dryer's fabric filter baghouse shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter baghouse is operating.

 The permittee shall record the differential pressure drop readings on a daily basis, in a log book, when the plant is operating. Refer to Condition 36 for record keeping requirements to demonstrate compliance with this condition.
(9 VAC 5-80-1180 D, 9 VAC 5-50-20 C and 9 VAC 5-50-260)

5. **Monitoring Devices: Engine-Driven Screen** - The engine (Ref. # E:S) that powers the screening unit at the RAP processing plant shall be equipped with a non-resettable hour meter which measures the duration of time that the engine is operated. Refer to Condition 36 for record keeping requirements to demonstrate compliance with this condition.

The monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations.

The monitoring device shall be provided with adequate access for inspection and shall be in operation when the engine is operating.
(9 VAC 5-80-1180 D, and 9 VAC 5-50-20 C)

6. **Fugitive Dust Emission Controls** – Fugitive emission controls shall include the following, or equivalent, as approved by the DEQ:
 - a. Dust from material handling, load-outs, the RAP crusher and screen (Ref. # RAP:C, RAP:S) shall be controlled by wet suppression or equivalent (as approved by the DEQ).
 - b. All material being stockpiled shall be kept adequately moist to control dust during storage and handling, or covered at all times to minimize emissions.
 - c. Dust from haul roads and traffic areas shall be controlled by the application of asphalt, water, suitable chemicals, or equivalent methods approved by the DEQ.
 - d. Reasonable precautions shall be taken to prevent deposition of dirt on public roads and subsequent dust emissions. Dirt, product, or raw material spilled or tracked onto paved surfaces shall be promptly removed to prevent particulate matter from becoming airborne.
 - e. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(9 VAC 5-50-90 and 9 VAC 5-50-260)
7. **Screen Wet Suppression System Monitoring** - The permittee shall perform monthly inspections of the wet suppression system for the RAP processing plant screen (Ref. # RAP:S) to check that water is flowing to discharge nozzles. The permittee shall initiate corrective action within 24 hours and complete corrective action as expediently as practical if water is not flowing properly during an inspection of the water spray nozzles. The permittee shall record each inspection of the water spray nozzles, including date of each inspection and any corrective actions taken, in a logbook. Refer to Condition 37 for record keeping requirements to demonstrate compliance with this condition.
(9 VAC 5-80-1180 D and 9 VAC 5-50-260)

OPERATING LIMITATIONS

8. **Production** - The hourly production of asphalt concrete from the CMI model STD400 plant (Ref. # P:2) shall not exceed 310 tons per hour, as demonstrated from hourly plant production records maintained on site.
(9VAC 5-80-1180)

9. **Production** - Total production of asphalt concrete shall not exceed the following, calculated monthly as the sum of each twelve consecutive month period:

Unit 1 (Ref. # P:1) – 810,000 tons per year
Unit 2 (Ref. # P:2) – 170,000 tons per year

Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.
(9 VAC 5-80-1180)

10. **RAP Processing Plant Throughput** - Total throughput of Recycled Asphalt Pavement (RAP) through the crushing and screening equipment (Ref. # RAP:C, RAP:S) shall not exceed 490,000 tons per year, calculated monthly as the sum of each consecutive twelve month period. Also, the engine (Ref. # E:S) that powers the screening equipment (Ref. # RAP:S) shall not operate more than 3300 hours per year. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.
(9 VAC 5-80-1180)

11. **Fuel: Asphalt Plants** - The approved fuels for the asphalt plants, Units 1 and 2 (Ref. # P:1 and P:2) are No. 2 distillate fuel oil, recycled fuel oil and natural gas that do not exceed the specifications provided in Condition 14. Natural gas may be used as an approved fuel for the equipment that is appropriately designed to accommodate this fuel. A change in the fuels may require a permit to modify and operate.
(9 VAC 5-80-1180)

12. **Fuel: Heaters** - The approved fuels for the liquid asphalt storage tank heaters are No. 2 distillate fuel oil and natural gas that do not exceed the specifications provided in Condition 14. Natural gas may be used as an approved fuel for the equipment that is appropriately designed to accommodate this fuel. A change in the fuels may require a permit to modify and operate.
(9 VAC 5-80-1180)

13. **Fuel: Diesel Engine** - The approved fuel for the engine that powers the RAP screening plant (Ref. # RAP:S) is ultra low sulfur diesel fuel oil that does not exceed the specifications provided in Condition 14. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-1180)

14. **Fuel Specifications** - The fuels shall meet the specifications below:

DISTILLATE OIL which meets the ASTM specifications for numbers 1 or 2 fuel oil:

Maximum sulfur content per shipment: 0.5%

RECYCLED/USED OIL

Maximum Sulfur Content (weight percent)	0.5%
Maximum halogen (as chlorine) content (parts per million)	1000 ppm
PCB (parts per million)	49 ppm
Chromium (parts per million)	10 ppm
Lead (parts per million)	100 ppm
Arsenic (parts per million)	5 ppm
Cadmium (parts per million)	2 ppm
Flash Point (minimum)	100° F

DIESEL FUEL OIL which meets the American Society for Testing and Materials (ASTM) specification, D975, for grade ultra low sulfur 2-D or grade 2-D S15; or has a maximum sulfur not to exceed 0.0015% by weight (15 ppm), and either a minimum cetane number of forty or maximum aromatic content of thirty-five volume percent.

NATURAL GAS of pipeline quality.
(9 VAC 5-80-1180)

15. Fuel Certification: Distillate Oil - The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:

- a. The name of the fuel supplier;
- b. The date on which the distillate oil was received;
- c. The volume of distillate oil delivered in the shipment;
- d. A statement that the distillate oil complies with the American Society for Testing and Materials specifications (ASTM) for numbers 1 or 2 fuel oil; and
- e. The sulfur content of the distillate oil.
(9 VAC 5-170-160)

16. Fuel Certification: Recycled/Used Oil - The permittee shall obtain a certification from the recycled/used oil supplier, including sampling and analysis representative of each shipment purchased. Each used oil supplier certification shall include the following:

- a. The name of the fuel supplier;
- b. The date on which the recycled/used oil was received;

- c. The volume of recycled/used oil delivered in the shipment;
 - d. The content of arsenic, cadmium, chromium, lead, PCBs, and halogens with the recycled/used oil in ppm, by weight;
 - e. The sulfur content of the recycled/used oil;
 - f. The flash point of the recycled/used oil;
 - g. Documentation of the recycled/used oil analysis indicating the location of the recycled/used oil when the sample was drawn; and
 - h. The test methods used to determine the contaminant level in the recycled/used oil.
(9 VAC 5-170-160)
- 17. Fuel Certification: Diesel Fuel Oil** - The permittee shall obtain a certification from the fuel supplier with each shipment of diesel fuel oil. Each fuel supplier certification shall include the following:
- a. The name of the fuel supplier;
 - b. The date on which the diesel fuel oil was received;
 - c. The volume of diesel fuel oil delivered in the shipment;
 - d. A statement that the diesel fuel oil complies with the American Society for Testing and Materials specifications (ASTM) for grade ultra low sulfur 2-D or grade 2-D S15, or equivalent as stated in Condition 14.
 - e. The sulfur content of the diesel fuel oil.
(9 VAC 5-170-160)
- 18. Fuel Throughput** - The total throughput of No. 2 distillate fuel oil for the liquid asphalt storage tank heaters, Gencor – Hy Way model HYTGO-340, and the Heatec model HC-120 (Ref. # H:1 and H:2), shall not exceed 120,000 gallons per year, calculated monthly as the sum of each consecutive twelve-month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months. Natural gas may be used instead of distillate fuel oil in the asphalt heaters. The throughput of natural gas shall not exceed 16.6 million cubic feet per year, calculated monthly as the sum of each consecutive twelve-month period, which is equivalent in heat value to the fuel oil limit of 120,000 gallons per year. If both natural gas and distillate fuel oil are used in the heaters, the throughputs shall be reduced such that their combined total emissions, calculated using the emission factors in Condition 25, do not exceed the annual emission limits specified in Condition 26.
(9 VAC 5-80-1180)

19. Requirements by Reference - Except where this permit is more restrictive than the applicable requirement, the NSPS equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 60 Subpart I (applicable to hot mix asphalt facilities), and Subpart OOO (applicable to the RAP processing plant crusher and screen as non-metallic mineral processing equipment).
 (9 VAC 5-80-1180, 9 VAC 5-50-400 and 9 VAC 5-50-410)

20. Testing/Monitoring Ports – The facility shall be modified so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested by the DEQ at the appropriate locations and safe sampling platforms and access shall be provided.
 (9 VAC 5-50-30 F and 9 VAC 5-80-1180)

EMISSION LIMITS

21. Emission Limits: Asphalt Dryers - Emissions from the operation of the drum dyers (Ref. # P:1 and P:2) shall not exceed the particulate matter limit of 0.04 grains/dry standard cubic foot (gr/dscf) of exhaust gas as measured by EPA Method 5 (reference 40 CFR 60, Appendix A).
 (9 VAC 5-50-260, 9 VAC 5-50-400, 9 VAC 5-50-410 and 9 VAC 5-80-1180)

22. Emission Limits: Asphalt Dryers - Emissions from the operation of the drum dryers (Ref. #P:1 and P:2) shall not exceed the limits specified below:

	<u>Unit 1</u>	<u>Unit 2</u>
Nitrogen Oxides (as NO₂)		
Using recycled or distillate oil	0.052 lb/ton	0.063 lb/ton
Using natural gas	0.024 lb/ton	0.029 lb/ton
Carbon Monoxide		
Using recycled or distillate oil	0.084 lb/ton	0.073 lb/ton
Using natural gas	0.082 lb/ton	0.092 lb/ton
Volatile Organic Compounds (VOCs)		
Using recycled or distillate oil	0.020 lb/ton	0.020 lb/ton
Using natural gas	0.030 lb/ton	0.030 lb/ton
Sulfur Dioxide (SO₂)		
Using recycled or distillate oil	0.034 lb/ton	0.034 lb/ton
Using natural gas	0.0034 lb/ton	0.0034 lb/ton
PM₁₀ (filterable and condensable)	0.036 lb/ton	0.029 lb/ton
PM-2.5 (filterable and condensable)	0.036 lb/ton	0.027 lb/ton

The above emission limits are in pounds per ton of asphalt produced, and derived from earlier stack testing conducted at the facility and manufacturer data at or near the maximum design capacity of the drum dryer plants. The permittee may also conduct emissions testing to establish fuel specific emission factors, if approved by DEQ. In addition, the facility may be subject to additional testing, if required by the DEQ, to demonstrate continuing compliance with the pollutant emission limits for Unit 1 or Unit 2 drum mix asphalt plants (Ref. # P:1 and P:2). These emission values shall be used as emission factors to calculate and demonstrate compliance with the annual emission limits provided in Condition 24. (9 VAC 5-50-260)

23. Hourly Emission Limits: Asphalt Dryers - Maximum hourly emissions from the operation of the drum dryers (Ref. #P:1 and P:2) are determined as specified below:

	Unit 1 <u>Ref. # P:1</u>	Unit 2 <u>Ref. # P:2</u>
Nitrogen Oxides (NO ₂)	31.20 lbs/hr	19.53 lbs/hr
Carbon Monoxide	50.40 lbs/hr	28.52 lbs/hr
Sulfur Dioxide	20.40 lbs/hr	10.54 lbs/hr
PM10 (filterable and condensable)	21.60 lbs/hr	8.99 lbs/hr
PM-2.5 (filterable and condensable)	21.60 lbs/hr	8.37 lbs/hr
Volatile Organic Compounds (VOCs)	18.00 lbs/hr	9.30 lbs/hr

These emissions are derived from the limits given in Condition 21, and the maximum rated or permitted capacity for each drum dryer unit. The emissions are provided for informational and inventory purposes only. Compliance with the emission limits will be determined based on Conditions 22 and 24. (9 VAC 5-50-260 and 9 VAC 5-80-1180)

24. Emission Limits: Asphalt Dryers – Total annual emissions from the operation of the counter flow dryers (Ref. # P:1 and P:2) shall not exceed the limits specified below:

Nitrogen Oxides (NO ₂)	26.42 tons/yr.
Carbon Monoxide	41.84 tons/yr.
Sulfur Dioxide	16.66 tons/yr.
PM10 (filterable and condensable)	17.05 tons/yr.
PM-2.5 (filterable and condensable)	16.88 tons/yr.
Volatile Organic Compounds (VOCs)	14.70 tons/yr.
Formaldehyde	1.52 tons/yr.
PAH*	0.43 tons/yr.

*Evaluated against worst case scenario of anthracene exemption levels.

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 9, 11, 14, 21, and 22.
 (9 VAC 5-80-1180, 9 VAC 5-50-260 and 9 VAC 5-80-320)

25. **Emission Limits: Asphalt Heaters** – Emissions from the operation of the asphalt cement heaters (Ref. # H:1 and H:2) shall not exceed the limits specified below, and shall be used in the calculation of the annual emissions, as limited in Condition 26:

	<u>Distillate Fuel Oil</u>	<u>Natural Gas</u>
Nitrogen Oxides (as NO ₂)	20 lb/1000 gal.	100 lb/million scf.
Carbon Monoxide	5 lb/1000 gal.	84 lb/million scf.
Volatile Organic Compounds (VOCs)	0.34 lb/1000 gal.	5.5 lb/million scf.
PM10 (filterable and condensable)	2.3 lb/1000 gal.	7.6 lb/million scf.
PM-2.5 (filterable and condensable)	2.1 lb/1000 gal.	7.6 lb/million scf.
Sulfur Dioxide (SO ₂)	71 lb/1000 gal.	0.6 lb/million scf.
(SO ₂ factor for oil = 142 x max. sulfur content)		(scf. = standard cubic feet)

Compliance shall be based on the proper operation and maintenance of the heaters using the approved fuels and by testing, if required by DEQ.
 (9 VAC 5-50-260)

26. **Emission Limits: Asphalt Heaters** – Total annual emissions from the operation of the asphalt cement heaters (Ref. #H:1 and H:2) shall not exceed the limits specified below:

Nitrogen Oxides (as NO ₂)	1.20 tons/yr.
Sulfur Dioxide	4.26 tons/yr.
CO	0.70 tons/yr.

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 12, 14, and 18.
 (9 VAC 5-50-260 and 9 VAC 5-80-1180)

27. **Emission Limits: RAP Screen Engine** - Emissions from the operation of the diesel engine (Ref. # E:S) that runs the screening plant (Ref. # RAP:S) shall not exceed the limits specified below:

	<u>Hourly Limit</u>	<u>Annual Limit</u>
Nitrogen Oxides (as NO ₂)	0.81 lbs/hr	1.46 tons/yr.
Carbon Monoxide	0.31 lbs/hr	0.51 tons/yr.
Volatile Organic Compounds (VOCs)	0.37 lbs/hr	0.60 tons/yr.

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number 10.
(9 VAC 5-50-260 and 9 VAC 5-80-1180)

- 28. Visible Emission Limit: Baghouse** - Visible emissions from each asphalt plant baghouse exhaust shall not exceed 5% opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)
- 29. Visible Emission Limit: RAP Processing Plant** - Visible emissions from the RAP processing plant crusher (Ref. # RAP:C) shall not exceed 10% opacity, and for the screen (Ref. # RAP:S) shall not exceed 7% opacity, as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-1180, 9 VAC 5-50-260 and 9 VAC 5-50-410)

INITIAL COMPLIANCE DETERMINATION

- 30. Visible Emissions Evaluation: RAP Processing Plant** - By May 15, 2012, Visible Emission Evaluations (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9, shall also be conducted by the permittee on the new screen (Ref. # RAP:S) at the RAP processing plant to determine compliance with the emission limit contained in Condition 29. Each test shall consist of thirty sets of twenty-four consecutive observations (at fifteen second intervals) to yield a six minute average. The details of the tests are to be arranged with the Regional Air Compliance Manager of the DEQ's NRO (at the address referenced in Condition 34). The permittee shall submit a test protocol at least thirty days prior to testing. The evaluation shall be performed, reported and demonstrate compliance within forty-five days after test completion. Two copies of the test result shall be submitted to the Regional Air Compliance Manager of the DEQ's NRO (at the address referenced in Condition 34) within forty-five days after test completion and shall conform to the test report format enclosed with this permit. One copy of the test results shall be sent to EPA Region III within forty-five days after test completion at the address in the cover letter of this permit.
(9 VAC 5-50-30, 9 VAC 5-80-1200, and 9 VAC 5-50-410)
- 31. Visible Emissions Evaluation RAP Processing Plant** - Visible Emission Evaluations (VEE) required in Condition 30 on the new screen (Ref. # RAP:S) at the RAP processing plant may be reduced to ten sets of twenty-four consecutive observations (at fifteen second intervals) to yield a six minute average if:
- a. There are no individual readings greater than 10% opacity for the screen (at the RAP processing plant), and

- b. There are no more than three readings of 10% opacity for the one hour period for the screen (at the RAP processing plant).

(9 VAC 5-180-1200, 40 CFR 60.675(C)(4) and 9 VAC 5-50-410)

CONTINUING COMPLIANCE DETERMINATION

32. **Stack Tests** - Upon request by the DEQ, the permittee shall conduct additional performance tests to demonstrate compliance with the emission limits contained in this permit. The details of the tests shall be arranged with the Regional Air Compliance Manager of the DEQ's NRO at the address referenced in Condition 34.

(9 VAC 5-80-1200 and 9 VAC 5-50-30 G)

33. **Visible Emissions Evaluation** - Upon request by the DEQ, the permittee shall conduct additional visible emission evaluations to demonstrate compliance with the visible emission limits contained in this permit. The details of the tests shall be arranged with the Regional Air Compliance Manager of the DEQ's NRO at the address referenced in Condition 34.

(9 VAC 5-80-1200 and 9 VAC 5-50-30 G)

RECORDS AND NOTIFICATIONS

34. All correspondence concerning this permit should be submitted to the following address -

Regional Air Compliance Manager
Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193

(9 VAC 5-50-50)

35. **Initial Notifications** - The permittee shall furnish written notification to the Regional Air Compliance Manager of the DEQ's NRO (at the address referenced in Condition 34) of:
- a. The actual date on which construction of the RAP screening unit (Ref. # RAP:S) at the RAP processing plant commenced within fifteen days after permit issue date. The notification must also include the following information (for the engine subject to federal regulations);
- i. Name and address of the permittee;
 - ii. The address of the affected source;
 - iii. Engine information including make, model, engine family, serial number, model year, maximum engine power and engine displacement;

- iv. Emission control equipment; and
 - v. Fuel used.
- b. The actual start-up date of the screening unit (Ref. # RAP:S), within fifteen days after permit issue date.
 - c. The anticipated date of performance tests (visible emission evaluation) of the screening unit (Ref. # RAP:S), as stated in Conditions 30 and 31, postmarked at least thirty days prior to such date.

Copies of the written notifications referenced in items a and b above are to be sent to:

Associate Director
Office of Air Enforcement (3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-50-50 and 9 VAC 5-80-1180)

- 36. **Emission Statement** - The owner of a stationary source emitting 25 tons per year or more of volatile organic compounds or nitrogen oxides shall submit a completed emission statement to the Regional Air Compliance Manager of the DEQ's NRO (at the address listed in Condition 34) by April 15th of each year for the emissions discharged during the previous calendar year. The emission statement shall be prepared and submitted in the appropriate format.
(9 VAC 5-20-160 B)
- 37. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Regional Air Compliance Manager of the DEQ's NRO at the address referenced in the Condition 34. These records shall include, but are not limited to:
 - a. Hourly production of asphalt concrete for Plant 2 (Ref. #P:2), that demonstrate compliance with the hourly production limit (as referenced in Condition 8).
 - b. Annual production of asphalt concrete for each asphalt plant (as referenced in Condition 9), calculated monthly as the sum of each consecutive twelve-month period.
 - c. Annual throughput of recycled asphalt pavement (RAP) at the RAP processing plant, calculated monthly as the sum of each consecutive twelve-month period.
 - d. Annual throughput of No. 2 distillate fuel oil and natural gas for the asphalt cement heaters (as referenced in Condition 18), calculated monthly as the sum of each consecutive twelve-month period.

- e. The daily fabric filter baghouse differential pressure gauge readings as required by Condition 4.
- f. Monthly records on the inspection of the wet suppression system water spray nozzles for the RAP processing plant screen (Ref. # RAP:S) that includes dates and any corrective actions taken, as maintained in a logbook (in written or electronic format).
- g. Monthly Summary Table for the diesel engine of the portable screening plant (Ref. # RAP:S) to include:
 - i. Engine run hours.
 - ii. Total engine run hours calculated on a rolling twelve month basis.
- h. All fuel supplier certifications (as referenced in Conditions 14, 15, 16, and 17).
- i. Monthly emission calculations or data necessary to demonstrate compliance with the emission limits contained in Conditions 24 and 26.
- j. Annual throughput of the solvent (TEKUSOLV II) used in the parts cleaning machine (Ref. #100-A), calculated as the sum of each consecutive twelve-month period.
- k. Results of all stack tests, visible emission evaluations and performance evaluations.
- l. Records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. The records shall be maintained in a form suitable for inspection and maintained for at least two years (unless a longer period is specified in the applicable emission standard) following the date of the occurrence.

Compliance for subsections b, c, d and j for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years, unless otherwise noted.
(9 VAC 5-80-1180 and 9 VAC 5-50-50)

GENERAL CONDITIONS

38. Certification of Documents

- A. The following documents submitted to the Board shall be signed by a responsible official: (i) any emission statement, application, form, report, or compliance certification; (ii) any document required to be signed by any provision of the regulations of the Board; or (iii) any other document containing emissions data or compliance information the owner wishes the Board to consider in the administration of its air quality programs. A responsible official is defined as follows:

1. For a business entity, such as a corporation, association or cooperative, a responsible official is either:
 - a. The president, secretary, treasurer, or a vice president of the business entity in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the business entity; or
 - b. A duly authorized representative of such business entity if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either (i) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars) or (ii) the authority to sign documents has been assigned or delegated to such representative in accordance with procedures of the business entity.
2. For a partnership or sole proprietorship, a responsible official is a general partner or the proprietor, respectively.
3. For a municipality, state, federal, or other public agency, a responsible official is either a principal executive officer or ranking elected official. A principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of the principal geographic unit of the agency.

- B. Any person signing a document under subsection A above shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

- C. Subsection B shall be interpreted to mean that the signer must have some form of direction or supervision over the persons gathering the data and preparing the document (the preparers), although the signer need not personally nor directly supervise these activities. The signer need not be in the same line of authority as the preparers, or do the persons gathering the form need to be employees (e.g., outside contractors can be used). It is sufficient that the signer has authority to assure that the necessary actions are taken to prepare a complete and accurate document.

- 39. Permit Suspension/Revocation** - This permit may be suspended or revoked if the permittee:
- a. Knowingly makes material misstatements in the permit application or any amendments to it;
 - b. Fails to comply with the conditions of this permit;
 - c. Fails to comply with any emission standards applicable to a permitted an emissions unit, included in this permit;
 - d. Causes emissions from the stationary source which result in violations of, or interfere with the attainment and maintenance of, any ambient air quality standard; or
 - e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted.
- (9 VAC 5-80-1210 F)

- 40. Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:
- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
 - c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
 - d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130 and 9 VAC 5-80-1180)

- 41. Maintenance/Operating Procedures** – The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices and process equipment which affect such emissions:
- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-50-20 E and 9 VAC 5-80-1180 D)

- 42. Record of Malfunctions** – The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.
(9VAC 5-20-180 J and 9 VAC 5-80-1180 D)

- 43. Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Regional Air Compliance Manager of the DEQ's NRO (at the address referenced in Condition 34) of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Regional Air Compliance Manager of the DEQ's NRO in writing.
(9 VAC 5-20-180 C and 9 VAC 5-80-1180)

- 44. Notification for Control Equipment Maintenance** - The permittee shall furnish notification to the Regional Air Compliance Manager of the DEQ's NRO (at the address referenced in Condition 34) of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least twenty-four hours prior to the shutdown. The notification shall include, but is not limited to, the following information:
- a. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;
 - b. The expected length of time that the air pollution control equipment will be out of service;

- c. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;
- d. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.

(9 VAC 5-20-180 B)

45. Violation of Ambient Air Quality Standard - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-1180)

46. Change of Ownership - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Regional Air Compliance Manager of the DEQ's NRO at the address referenced in Condition 34 of the change of ownership within thirty days of the transfer.
(9 VAC 5-80-1240)

47. Permit Copy - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-1180)

SOURCE TESTING REPORT FORMAT

Report Cover

1. Plant name and location
2. Units tested at source (indicate Ref. No. used by source in permit or registration)
3. Test Dates.
4. Tester, name, address and report date

Certification

1. Signed by team leader/certified observer (include certification date)
2. Signed by responsible company official
3. *Signed by reviewer

Copy of approved test protocol

Summary

1. Reason for testing
2. Test dates
3. Identification of unit tested & the maximum rated capacity
4. *For each emission unit, a table showing:
 - a. Operating rate
 - b. Test Methods
 - c. Pollutants tested
 - d. Test results for each run and the run average
 - e. Pollutant standard or limit
5. Summarized process and control equipment data for each run and the average, as required by the test protocol
6. A statement that test was conducted in accordance with the test protocol or identification & discussion of deviations, including the likely impact on results
7. Any other important information

Source Operation

1. Description of process and control devices
2. Process and control equipment flow diagram
3. Sampling port location and dimensioned cross section Attached protocol includes: sketch of stack (elevation view) showing sampling port locations, upstream and downstream flow disturbances and their distances from ports; and a sketch of stack (plan view) showing sampling ports, ducts entering the stack and stack diameter or dimensions

Test Results

1. Detailed test results for each run
2. *Sample calculations
3. *Description of collected samples, to include audits when applicable

Appendix

1. *Raw production data
2. *Raw field data
3. *Laboratory reports
4. *Chain of custody records for lab samples
5. *Calibration procedures and results
6. Project participants and titles
7. Observers' names (industry and agency)
8. Related correspondence
9. Standard procedures

* Not applicable to visible emission evaluations



Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/D

Alexandria and Occoquan Branch Office
P.O. Box 22247
Alexandria, VA 22304
(703) 751 7100
(703) 751 4249 Fax

November 29, 2011

Regional Air Compliance Manager
Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193

RE: Initial Notification Registration No.: 70579

Dear Mr. Hartshorn:

Virginia Paving Company recently received an updated operating permit (Registration No. 70579) that includes the new engine-driven screen. Condition 34 of the permit, entitled "Initial Notifications," requests that Virginia Paving Company provide the actual date of construction of the RAP screening unit, the actual start-up date, and the anticipated date of performance tests.

The actual date of construction AND start-up of the RAP screening unit (Ref. #RAP:S) was May 1, 2011. This information has been provided to VDEQ in the application submittal package dated August 15, 2011. Additional information requested in Condition 34 is provided below:

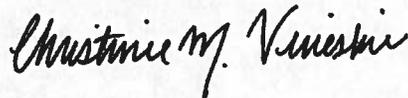
- a. **Name and address of the permittee:**
Virginia Paving Company
5601 Courtney Avenue
Alexandria, VA 22304
- b. **Address of affected source:**
5601 Courtney Avenue
Alexandria, VA 22304
- c. **Engine Information:**
Make: Caterpillar
Model: C4.4 ACERT TA
Engine Family: 8PKXL04.4NJ1
Serial Number: 44405018
Model Year: 2008
Maximum Engine Power: 129.4 HP
Engine Displacement: 4.4 Liters
- d. **Emission Control Equipment: Wet Suppression**

- e. **Fuel Used:** Ultra-low sulfur diesel fuel with maximum sulfur content not to exceed 0.0015% by weight.

Virginia Paving Company will conduct a visual emission evaluation on the referenced equipment in the future and will submit a protocol 30 days prior to the date of the performance test. Correspondence indicating anticipated date of this performance test will also be issued in the future.

If you have any questions or require additional information, please do not hesitate to call me at (703) 751 – 7100.

Very truly yours,



Christine M. Vineski
Environmental Specialist

CMV

CC: GAW, MCC, DMH, CDM, City of Alexandria, EPA-Region III



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Alexandria and Occoquan Branch Office
P.O. Box 22247
Alexandria, VA 22304
(703) 751 7100
(703) 751 4249 Fax

November 29, 2011

Associate Director
Office of Air Enforcement (3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Initial Notification Registration No.: 70579 COPY

Dear Associate Director,

Virginia Paving Company recently received an updated operating permit (Registration No. 70579) that now includes a new engine-driven screen. Condition 34 of the permit, entitled "Initial Notifications," requests that Virginia Paving Company provide specific information to Virginia Department of Environmental Quality and copy EPA-Region III on these written notifications. Please see enclosed letter to Virginia Department of Environmental Quality for this information.

If you have any questions or require additional information, please do not hesitate to call me at (703) 751-7100.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Christine M. Vineski'.

Christine M. Vineski
Environmental Specialist

CMV
Enclosures
CC: GAW, MCC, DMH, CDM, City of Alexandria



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Alexandria and Occoquan Branch Office
P.O. Box 22247
Alexandria, VA 22304
(703) 751 7100
(703) 751 4249 Fax

November 29, 2011

Regional Air Compliance Manager
Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193

RE: Initial Notification Registration No.: 70579

Dear Mr. Hartshorn:

Virginia Paving Company recently received an updated operating permit (Registration No. 70579) that includes the new engine-driven screen. Condition 34 of the permit, entitled "Initial Notifications," requests that Virginia Paving Company provide the actual date of construction of the RAP screening unit, the actual start-up date, and the anticipated date of performance tests.

The actual date of construction AND start-up of the RAP screening unit (Ref. #RAP:S) was May 1, 2011. This information has been provided to VDEQ in the application submittal package dated August 15, 2011. Additional information requested in Condition 34 is provided below:

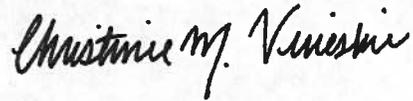
- a. **Name and address of the permittee:**
Virginia Paving Company
5601 Courtney Avenue
Alexandria, VA 22304
- b. **Address of affected source:**
5601 Courtney Avenue
Alexandria, VA 22304
- c. **Engine Information:**
Make: Caterpillar
Model: C4.4 ACERT TA
Engine Family: 8PKXL04.4NJ1
Serial Number: 44405018
Model Year: 2008
Maximum Engine Power: 129.4 HP
Engine Displacement: 4.4 Liters
- d. **Emission Control Equipment:** Wet Suppression

- e. **Fuel Used:** Ultra-low sulfur diesel fuel with maximum sulfur content not to exceed 0.0015% by weight.

Virginia Paving Company will conduct a visual emission evaluation on the referenced equipment in the future and will submit a protocol 30 days prior to the date of the performance test. Correspondence indicating anticipated date of this performance test will also be issued in the future.

If you have any questions or require additional information, please do not hesitate to call me at (703) 751 – 7100.

Very truly yours,



Christine M. Vineski
Environmental Specialist

CMV

CC: GAW, MCC, DMH, CDM, City of Alexandria, EPA-Region III



APPENDICES D

Commonwealth of Virginia

Registration No:	70579	AFS Plant ID:	510-00001
Plant Name:	Virginia Paving Company Alexandria Plant	Classification:	Synthetic Minor
Address:	5601 Courtney Ave	Region:	NVRO
		Report No:	283967

AIR INSPECTION REPORT

Inspection Date:	06/14/12	Contact Name:	Christine Vineski
Type:	PCE Without Site Visit	Contact Phone No:	(703)751-7100
Inspector:	Jonathan W Carney	<u>Air Program</u>	<u>Subpart</u>
Inspection Result:	In Compliance	NSPS	I
Reason:	Review VEE Report	NSPS	000
		SIP	

Inspector Comments:

The Virginia Department of Environmental Quality-Northern Regional Office (DEQ-NRO) received a Visible Emissions Evaluation Report (VEE) from Virginia Paving Company Alexandria on June 7, 2012. This VEE was not observed by DEQ-NRO staff.

According to the report, the VEE was conducted on May 9, 2012 on the Recycled Asphalt Pavement Screen (Ref # RAP:S) by Ms. Christine Vineski of Virginia Paving Company. Reduced testing of one (1) 1-hour run was performed in accordance with the facility's current Virginia Stationary Source Permit to Modify and Operate dated May 15, 2012. The report appears to indicate that the VEE was conducted in accordance with EPA Reference Method 9 and the submitted protocol reviewed and approved by DEQ-NRO staff (Jonathan Carney) on April 23, 2012. The reported throughput of the RAP during the test was 249 tons/hour which was above the 50% minimum throughput approved in the protocol. Results of the VEE appear to indicate that there were no individual opacity readings greater than 0%. These readings were below the 7% maximum opacity limit in the permit.

As a result of this inspection, DEQ targeting data for this facility was reviewed and modified as necessary for planning purposes.

Inspector's Electronic Signature
Approval Date: Jun 14, 2012

Manager's Electronic Signature
Approval Date: Jun 18, 2012



Commonwealth of Virginia

Registration No: 70579

AFS Plant ID: 510-00001

Plant Name: Virginia Paving Company
Alexandria Plant

Classification: Synthetic Minor

Region: NVRO

Address: 5601 Courtney Ave

Report No: 283967

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		(9 VAC 5-50-30, 9 VAC 5-80-1200, and 9 VAC 5-50-410)		



**VIRGINIA
PAVING
COMPANY**

Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/D

Alexandria and Occoquan Branch Office
P.O. Box 22247
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(703) 751 7100
(703) 751 4249 Fax

April 18, 2012

Jonathan Carney
Air Compliance Inspector
Virginia DEQ
13901 Crown Court
Woodbridge, VA 22193

RE: Response to Test Protocol

Dear Mr. Carney,

This letter serves as a response to your email dated 4/16/12, regarding the test protocol for Visible Emissions Evaluations (VEE's) to be conducted on the RAP Screen (Ref. # RAP:S) at the Virginia Paving Company – Alexandria Plant.

The name of the individual performing the VEE and a copy of their VEE Certification will be mailed and sent electronically to DEQ prior to the evaluation. A condition including this understanding has been added to the protocol and can be found on page 3.

Language has also been added to the protocol to include the condition that the RAP Screen (Ref. # RAP:S) will operate at greater than 50% of maximum throughput and that the throughput rate (tons/hr) will be recorded for each set. This condition can also be found on page 3 of the revised protocol. A copy of the revised protocol and a document certification are enclosed.

If you have any additional questions, please do not hesitate to contact me. I can be reached at (703)751-7100.

Yours Truly,

Christine Vineski
Environmental Specialist

CMV
Enclosures
cc: DMH, CDM

DOCUMENT CERTIFICATION

Facility Name: Virginia Paving Company – Alexandria

Registration No. 70579

Facility Location: 5601 Courtney Avenue Alexandria 22304

Type of Submittal Attached: Test Protocol for VEE on RAP Screen (Ref. # RAP:S)

Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Responsible Official (Print): David M. Horton

Title: Plant Manager

Signature: 

Date: April 18, 2012



Plant Name:
Virginia Paving Company –
Alexandria

Plant Location:
5601 Courtney Ave.
Alexandria, VA. 22304
(703) 751-7100

Office Address:
5601 Courtney Ave.
Alexandria, VA. 22304
(703) 751-7100

**Test Protocol for Initial
Compliance
Determination: Visible
Emission Evaluation to be
Conducted on RAP Screen
(Ref # RAP:S)**

VDEQ Reg. No. : 70579

**Tentative Test Date: May 14, 2012
Protocol Date: April 13, 2012**

Source Information

Name: Virginia Paving Company – RAP Screen (Ref. # RAP:S)

Equipment Description: A screening unit, McCloskey model R155, for the Recycled Asphalt Pavement (RAP) operation. It is rated at 400 tons/hour.

Associated Site Air Registration Number: 70579

Test Location: Virginia Paving – Alexandria Plant
Reg. No. 70579
5601 Courtney Avenue
Alexandria, VA 22304

Contact Information

Source Contact: David Horton
Plant Manager
(703) 751-7100 (office)

Secondary Contact: Chris Monahan
Environmental Manager
(703)230-0850 (office)

Testing Contact: Christine Vineski
Environmental Specialist
(703) 751-7100 (office)
(703) 675-9623 (cell)
cmvineski@laneconstruct.com

Process Description

Virginia Paving Company will operate the RAP screen (Ref. # RAP:S) at the RAP processing plant to complete initial Visible Emissions Evaluations (VEE) in accordance to permit requirements. The RAP screen (Ref. # RAP:S) is rated at 400 tons/hour. During the testing, the RAP screen (Ref. # RAP:S) will operate at no less than 50% of the maximum rated throughput. The throughput rate (tons/hour) will be recorded for each set and will be reported with the test results.

Test Program, Sampling, and Procedures

Opacity Determination – EPA Method 9

The objective of the Method 9 test program will be to determine the opacity of visible emissions coming off the RAP screen.

Visible Emission Evaluations (VEE) will be conducted in accordance with 40 CFR Part 60, Appendix A, Method 9 in order to determine compliance with the visible emission limit. The test will consist of thirty sets of twenty-four consecutive observations (at fifteen second intervals) to yield a six minute average.

Opacity Determination Procedure

The Visible Emission Evaluations (VEE) will be conducted by an observer who has been certified in accordance with EPA Method 9. The observer's certification documentation will be provided to VDEQ prior to testing and will be included in the compliance report.

Visible Emission Evaluations (VEE) on the RAP screen (Ref. # RAP:S) at the RAP processing plant will be reduced to ten sets of twenty-four consecutive observations (at 15 seconds intervals) to yield a six minute average if:

- a) There are no individual readings greater than 10% opacity for the screen (at the RAP processing plant), and
- b) There are no more than three readings of 10% opacity for the one hour period for the screen (at the RAP processing plant).

Observer Position

The observer will stand at a distance that provides a clear view of the emissions with the sun oriented in the 140° sector to their back. In addition, the observer will make observations from a position at which the line of vision is approximately perpendicular to the plume direction.

Opacity Observation – EPA Method 9

Opacity observation will be made at the point of greatest opacity in the portion of the plume where condensed water vapor is not present.

Visible Emission Evaluations (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9, will be conducted on the new screen (Ref. # RAP:S) at the RAP processing plant to determine compliance with the emission limit. The test will consist of thirty sets of twenty-four consecutive observations (at fifteen second intervals) to yield a six minute average.

Readings will be made to the nearest 5percent opacity and taken against a clearly visible background that gives the highest degree of contrast.

EPA VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)
 Method 9 203A 203B Other: _____

Company Name _____
 Facility Name _____
 Street Address _____
 City _____ State _____ Zip _____

Process _____ Unit # _____ Operating Mode _____
 Control Equipment _____ Operating Mode _____

Describe Emission Point _____

 Height of Emiss. Pt. _____ Height of Emiss. Pt. Rel. to Observer _____
 Start _____ End _____ Start _____ End _____
 Distance to Emiss. Pt. _____ Direction to Emiss. Pt. (Degrees) _____
 Start _____ End _____ Start _____ End _____

Vertical Angle to Obs. Pt. _____ Direction to Obs. Pt. (Degrees) _____
 Start _____ End _____ Start _____ End _____
 Distance and Direction to Observation Point from Emission Point _____
 Start _____ End _____

Describe Emissions _____
 Start _____ End _____
 Emission Color _____ Water Droplet Plume _____
 Start _____ End _____ Attached Detached None

Describe Plume Background _____
 Start _____ End _____
 Background Color _____ Sky Conditions _____
 Start _____ End _____ Start _____ End _____
 Wind Speed _____ Wind Direction _____
 Start _____ End _____ Start _____ End _____
 Ambient Temp. _____ Wet Bulb Temp. _____ RH Percent _____
 Start _____ End _____

Source Layout Sketch

Draw North Arrow
 TN MN

X Observation Point

Observer's Position

140°

Sun Location Line

FEET

FEET

Side View

Stack With Plume

Sun

Wind

Longitude _____ Latitude _____ Declination _____

Additional Information _____

Form Number _____ Page _____ Of _____
 Continued on VEO Form Number _____

Sec Min	Time Zone				Start Time	End Time	Comments
	0	15	30	45			
1							
2							
3							
4							
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30							

Observer's Name (Print) _____
 Observer's Signature _____ Date _____
 Organization _____
 Certified By _____ Date _____



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Mailing address: P.O. Box 1105, Richmond, Virginia 23218

TDD (804) 698-4021

www.deq.virginia.gov

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

Douglas W. Domenech
Secretary of Natural Resources

August 8, 2012

Mr. Chris D. Monahan
Environmental Coordinator
Virginia Paving Company – Alexandria Plant
5601 Courtney Avenue
Alexandria, Virginia 22304

Dear Mr. Monahan:

Congratulations! The Virginia Paving Company – Alexandria Plant has been accepted as an Exemplary Environmental Enterprise (E3) participant in the Virginia Environmental Excellence Program (VEEP). As an E3 participant, your facility is entitled to the following benefits: public recognition, permit fee discounts, and a single point-of-contact within the Department of Environmental Quality (DEQ). In addition, participation in the VEEP at the E3 level may provide your facility with certain types of administrative flexibility with environmental regulations.

You will be required to report annually to DEQ on progress towards implementation of your environmental management system and pollution prevention program. Your first annual report will be due by April 1, 2013, for calendar year 2012. If you are interested in having a recognition ceremony or discussing regulatory flexibility options, please contact me at (804) 698-4344 or sharon.baxter@deq.virginia.gov.

Welcome to the Virginia Environmental Excellence Program!

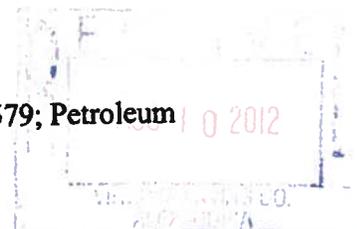
Sincerely,

A handwritten signature in blue ink that reads "Sharon K. Baxter".

Sharon K. Baxter, Manager
Office of Pollution Prevention

Enclosure

cc: Thomas A. Faha, Regional Director, Northern Regional Office
NRO Permit Files: Water Discharge VAG836036, VAR051466; Air 70579; Petroleum
30000593; Hazardous Waste VAD003479045



VEEP Application Review Comments



Facility Name: Virginia Paving Company - Alexandria Plant	Date: 7/30/2012
Reviewer: Keith Boisvert	APPLICATION: E3 new
Environmental Policy Statement	<input checked="" type="checkbox"/> Includes/stresses compliance, pollution prevention, training, communication & continuous improvement <input checked="" type="checkbox"/> Elements in policy statement evident in EMS <u>Comments:</u> All concepts are adequately addressed
Environmental Impacts	<input checked="" type="checkbox"/> Comprehensive list of impacts/aspects <input checked="" type="checkbox"/> Method for determining <i>significant</i> impacts/aspects <input checked="" type="checkbox"/> Impact/aspect review process outlined <input checked="" type="checkbox"/> Process defined for reevaluation <u>Comments:</u> Process for identifying and ranking aspects is clearly defined.
Environmental Objectives	<input checked="" type="checkbox"/> Goals (or objectives) address significant impacts/aspects <input checked="" type="checkbox"/> Tasks or projects planned for addressing each goal/objective with a targeted schedule for implementation <input type="checkbox"/> Ideally, objectives and targets should address VEEP commitments for tracking "Environmental Results" <u>Comments:</u> Objectives have tasks, timelines and responsible parties. With significant aspects undefined, it is impossible to relate significant aspects to objectives. Objectives do not relate to reporting commitments.
Waste Prevention Activities	<input checked="" type="checkbox"/> Dedicated p2 section listing projects & accomplishments <input checked="" type="checkbox"/> Reduction numbers and cost savings <input checked="" type="checkbox"/> Address P2 activities outside of significant impacts/aspects <u>Comments:</u> Excellent P2 Plan with many successful and innovative projects.
For E3 & E4 Facilities Only:	
Environmental Legal Requirements	<input checked="" type="checkbox"/> System for learning about legal requirements & changes in regulations <u>Comments:</u> It is the responsibility of the Environmental Department to stay current on regulations. Many resources are listed.
Roles, Responsibilities & Authorities	<input checked="" type="checkbox"/> Assignments for projects, tasks or reporting responsibilities <input checked="" type="checkbox"/> Upper management involvement or review <u>Comments:</u> Roles and responsibilities are clearly defined from top management down to non-supervisory employees.
Reporting & Record Keeping	<input checked="" type="checkbox"/> System for effective tracking of the EMS <u>Comments:</u>
Training	<input checked="" type="checkbox"/> Systematic approach ensuring all employees have role in EMS



**VIRGINIA
PAVING
COMPANY**

Division of The Lane Construction Corporation

5601 Courtney Avenue
Alexandria, VA 22304
(703)751-7100 (Phone)
(703)751-4249 (Fax)

www.virginiapaving.com

MEMORANDUM

To: Julius Holmes (City of Alexandria)
From: Christine Vineski (VPC)
Re: Hotline Complaints
Cc: DMH, BWG, CDM
Date: 10-01-12

Virginia Paving Company received two back-to-back complaints via the 24-hour complaint hotline on the night of Sunday, September 23, 2012. The first complaint was received at 10:46 PM and the second at 10:57 PM. Both callers, Mike Waite and Peter McFarren, were concerned about an odor they detected from their homes in Cameron Station. Virginia Paving Company immediately notified City of Alexandria's Air Pollution Specialist, Julius Holmes, who was able to arrive at the area of the complaint within 3 minutes. At his arrival he was able to confirm a slight intermittent asphalt odor.

Virginia Paving Company plant employees immediately investigated odor reducing technology (Blue Smoke Control System and odor reducing additive.) Equipment was confirmed to be functioning properly. At this point, the plant operator was instructed to lower temperatures and to reduce production to the lowest allowable tolerance. Dropping temperatures will impact quality as asphalt must meet state and federal specifications in order to be placed. After the initial complaint, Mr. Holmes (City Inspector) was able to verify that the isolated odor in Cameron Station had dissipated completely within 15 minutes.

The cooler temperatures and ideal meteorological conditions may have caused odors to "linger" in the area. To prevent potential odors, Virginia Paving Company has taken the following additional steps:

- Performed preventative maintenance on the Blue Smoke Control system by replacing all filters.
- Performed an in-depth analysis of all potential sources of odor. Maintenance review conducted on odor reducing additive injector, Blue Smoke Control system, central tank condensers & filter, and silo door operation.
- Tanker loads of asphalt cement are no longer scheduled to be delivered at nighttime.
- Manufacture the maximum amount of scheduled night production during the day shifts for the remainder of the paving season in order to minimize plant operating hours during the night.
- Continue to produce warm-mix at night, a technology that allows asphalt to be produced at much lower temperatures than traditional hot-mix asphalt.

Per the SUP, VPC has 110 night shifts allotted during the paving season. Currently 20 shifts remain. The night time paving season is winding down and ends on November 1st. We will continue to monitor operations closely to prevent potential odors from leaving our operations. If there are any questions, please do not hesitate to contact Christine Vineski, Environmental Specialist of Virginia Paving Company, at (703)751-7100. Citizens are reminded to utilize Virginia Paving Company's 24-hour hotline at (703)906-9918 if there is an immediate concern regarding plant operations.